



# FINAL Bitter Creek Wilderness

## Environmental Impact Statement

August 1989



Department of the Interior  
Bureau of Land Management

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Bureau of Land Management**

**FINAL  
Bitter Creek Wilderness  
Environmental Impact Statement**

This Wilderness Environmental Impact Statement considers the suitability of the Bitter Creek Wilderness Study Area, containing 59,660 acres of public lands for inclusion in the National Wilderness Preservation System.

Bitter Creek is located in the Lewistown District of the Bureau of Land Management, as is managed by the Valley Resource Area.

This study recommends that Bitter Creek not be designated as wilderness and that other multiple use management continue as prescribed in the Valley Management Framework Plan and the Prairie Potholes Grazing EIS.

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# SUMMARY

## PURPOSE OF THE EIS

The purpose of this EIS is to determine the suitability of the Bitter Creek Wilderness Study Area for inclusion in the National Wilderness Preservation System. This EIS is in response to Section 603 of the Federal Land Policy and Management Act, which directed the Bureau of Land Management to inventory, study and report to the Congress, through the Secretary of Interior and President, the suitability of certain lands for wilderness preservation.

## PURPOSE OF THE PROPOSED ACTION

The purpose of the proposed action is to continue current land uses and existing levels of resource management by not designating any part of the 59,660 acre WSA as wilderness. The WSA would be available for oil and gas exploration and development. Grazing management would continue as a key use and proposed range improvements would be developed. The WSA would remain open to off road vehicle use and existing levels of use, primarily for hunting, are expected to continue.

## SETTING

The Bitter Creek WSA consists of 59,660 acres and is located in an eroded prairie basin in northeast Montana, approximately 25 miles northwest of Glasgow and 18 miles south of the Canadian border.

## ISSUES

The WSA was considered in light of issues identified during both the wilderness inventory process and the study process. Concerns were expressed through letters, formal and informal public meetings and other public contacts.

The environmental issues considered in the document are: recreation management, range management, wildlife management and minerals development.

Air quality, topography, climate, soils, social conditions and cultural resources are discussed in Chapter 3, The Affected Environment. However, none of these resource concerns would be significantly impacted by the proposed action, or any of the alternatives, and are not discussed in Chapter 4, Environmental Consequences.

The potential benefits and the potential resource conflicts resulting from wilderness designation are identified in this document.

## ALTERNATIVES

Based on the scoping and planning process, four alternatives ranging from no wilderness to all wilderness for Bitter Creek were considered. Table 2.1 is an acreage summary for each alternative.

## STUDY RECOMMENDATION

The BLM's proposed action is the No Wilderness Alternative. The alternative proposes that none of the 59,660 acre Bitter Creek WSA be designated as wilderness and that the area be managed for multiple use as defined in the 1978 Valley Management Framework Plan and the 1980 Prairie Potholes Grazing EIS.

## MAJOR ENVIRONMENTAL CONSEQUENCES OF THE STUDY RECOMMENDATION

With the proposed action there would be little or no environmental impact on the grazing resource or grazing management, natural gas development, recreational opportunities or wildlife populations and habitat in the WSA. The opportunity to enhance primitive non-motorized recreation and to add this prairie ecotype to the wilderness system would be foregone.

There is potential for range development which would reduce the existing naturalness of Bitter Creek. There would be a short term impact on 2,310 acres that would be chiseled (see Glossary) to remove clubmoss. An additional 3 reservoirs and 3/4 mile of fence would be constructed in the WSA. Up to 20 waterfowl nesting islands could be constructed. Natural gas exploration and development (pad clearing and leveling and access road construction) could create significant site specific impacts on naturalness.

The opportunities for solitude will remain essentially the same as now available.





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# CHAPTER 1

## INTRODUCTION

### PURPOSE AND NEED

The Bitter Creek Wilderness Environmental Impact Statement (EIS) is in response to Section 603 of the Federal Land Policy and Management Act (FLPMA) of October 21, 1976. This law directed the Bureau of Land Management (BLM) to inventory, study and then report to Congress through the Secretary of the Interior and the President, the suitability of certain public lands for inclusion in the National Wilderness Preservation System (NWPS). This EIS follows the council on environmental quality guidance in complying with the National Environmental Policy Act.

This document completes the study requirements for one of the forty-two wilderness study areas (WSA) in Montana. The Federal Land Policy and Management Act requires the Secretary of the Interior to report his recommendations to the President by October 21, 1991. The President has until October 21, 1993, to send the recommendations to Congress, as only Congress can designate wilderness areas.

The purpose of this EIS is to analyze the affects of the proposed action and several alternatives to the proposed action. For analysis purposes no interim management policy (see glossary) considerations or constraints were considered in the proposed action (No Wilderness Alternative).

The study was conducted in accordance with BLM planning regulations (43 CFR 1601) which provide for the issuance of national policy and procedural guidance. The BLM's wilderness study policy serves this purpose. The policy establishes procedures to insure that suitability recommendations are: (1) based on full consideration of all multiple resource values of public lands; (2) consistent with established national policy; and (3) that all interested and affected members of the public and state and local governments are made aware of the study and given adequate opportunity to comment and be involved in the study process.

### ENVIRONMENTAL SETTING

The Bitter Creek WSA is located in Valley County, in north-east Montana, and is administered by the Valley Resource Area BLM Office located in Glasgow, Montana. The study area is about 25 miles northwest of Glasgow, and 18 miles south of the Canadian border (see figure 1.1). The WSA contains 59,660 acres in 3 roadless segments identified as Bitter Creek South, Bitter Creek West and Bitter Creek East.

Bitter Creek South contains 8,605 acres. This segment is bounded by roads on the east, south and west and by the Northern Border Pipeline corridor and roads on the north.

Bitter Creek West contains 11,105 acres and forms the west central part of the WSA. It is bounded on the north and east

by roads, on the west by private lands and on the south by the Northern Border Pipeline.

Bitter Creek East forms the central and northern portion of the WSA and contains 39,950 acres. It is bounded on the east, north and west by private land and on the south by the Northern Border Pipeline.

The 3 segments forming Bitter Creek consist of flat to rolling terrain varying less than 500 feet in elevation from south to north. Some extensive erosion resulting from glacial melt formed the denuded badland terrain through the center of the WSA. The vegetation consists of prairie grasses, creeping juniper, buffalo berry and other shrubs. There are isolated stands of aspen and cottonwood in the drainages. The climate is semi-arid, characterized by fluctuations in precipitation and temperature, moderately low rainfall, low humidity, hot summers and cold winters.

For the purpose of description and evaluation the WSA is described as 3 roadless areas in Chapter 3. However, one recommendation will be made for the entire WSA.

### PLANNING PROCESS

The lands comprising the Bitter Creek Wilderness Study Area are addressed in the Valley Management Framework Plan (MFP). The MFP makes coordinated land use allocations for all resources and establishes objectives and constraints for each resource and the activities that support it.

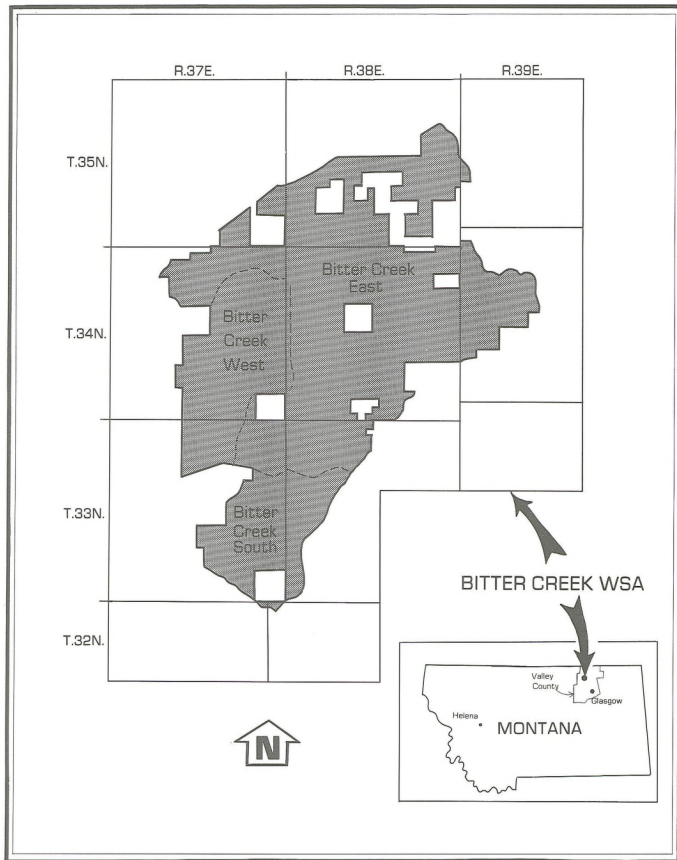
Conflicts between resources were reconciled through analysis and discussion, including public comment. The MFP contains specific resource recommendations, decisions and trade-offs based on particular resource conditions and was updated in 1977. Comments from the public were sought for the updated MFP by public meetings held in 1977 and 1978. The major MFP decisions that affected the development of wilderness are included in Appendix 1.1.

The MFP was completed prior to completion of the wilderness inventory and requires amending to include this wilderness study area and subsequent management decisions determined by Congress. This EIS, in conjunction with congressional action, will serve to amend the MFP.

The MFP amendment process is detailed in the Bureau of Land Management Planning Regulations Manual, Section 1601.8(b)(3) and 1601.6-3. The regulations require that the amendment process use all the steps of the new resource management planning process (43 CFR 1601). The planning steps are:

1. Identification of issues.
2. Development of planning criteria.
3. Inventory data and information collection.
4. Management situation analysis (present resources and management).
5. Selection of alternatives.
6. Analysis of alternatives impacts.

FIGURE 1.1 General Setting Map — Bitter Creek WSA





7. Selection of the preferred alternative (draft EIS).
8. Selection of resource management plan (final EIS).
9. Monitoring and evaluation.

## WILDERNESS INVENTORY

In November 1978 BLM began its wilderness review by preparing descriptions of areas of 5,000 or more roadless acres of public land and those areas of less than 5,000 acres but contiguous to wilderness areas or other wilderness study areas. These study units were reviewed by the public, closely inventoried by BLM and reviewed by BLM's Montana State Director in 1979-80. The State Director then released his final decision on the WSAs having the minimum characteristics of size, naturalness and outstanding opportunity for solitude and/or primitive recreation. The Montana Wilderness Inventory Final Decision - Bitter Creek was released in 1980. The public could protest this final decision and a number of protests were filed. A number of appeals were filed with the Interior Board of Land Appeals after the protests were denied by the Montana State Director. The last appeal was decided in May 1983, upholding the State Director's decision to study Bitter Creek for its wilderness suitability.

## ISSUE IDENTIFICATION (SCOPING)

Throughout the inventory stage of the wilderness review, the public had opportunities to attend meetings, open houses or other informal meetings in addition to letting BLM know of their concerns in writing. From this open forum, a number of issues were brought forth.

All preliminary issues were sent to the public as a first step in the study process (see Appendix 1.2).

In preparing the draft EIS, the interdisciplinary team and resource managers considered the major areas of environmental interest and concern identified through scoping. A more detailed discussion of the scoping process is given in Chapter 5. The following environmental issues were identified for analysis in this EIS:

### Recreation Management

What would be the impact of the proposed action and the alternatives on access for the elderly and/or disabled?

What would be the impact of the proposed action and the alternatives on recreational access/use levels?

### Range Management

What would be the impact of the proposed action and the alternatives on range improvement projects in the WSA?

### Vegetation Management

What would be the impact of the proposed action and the alternatives on the amount of noxious plant acreage in the WSA?

## Wildlife Management

What would be the impact of the proposed action and the alternatives on mule deer populations in the WSA?

What would be the impact of the proposed action and the alternatives on coyote populations in the WSA?

## Minerals Development

What would be the impact of the proposed action and the alternatives on development of natural gas in the WSA?

What would be the impact of the proposed action and the alternatives on development of other minerals (bentonite, sand and gravel) in the WSA?

Other concerns were raised during the scoping process but were either not within the scope of this document, or are addressed briefly in those sections described below. These concerns include:

Is there local support for wilderness areas in eastern Montana? This topic is discussed in the Social Conditions section of Chapter 3.

Is there significant evidence of human activity in the WSA? This concern is addressed in the Wilderness Quality Evaluation section of Chapter 3.

Would wilderness designation create an economic gain or loss in the local and regional economy? This topic is discussed in the economic conditions section of Chapter 3.

Would permittees lose some or all of their grazing privileges if the area were designated wilderness? There would be no changes affecting the current level of authorized grazing permits. Future grazing operations would be managed consistent with the Wilderness Management Plan (WMP). Modifications to current or proposed Allotment Management Plans (AMPs) may result from directions provided by the Wilderness Management Plan that would be prepared for Bitter Creek, if it were designated as wilderness.

Would wilderness designation impact oil development in the WSA? Oil was not identified as having occurrence potential in the GEM report prepared for the WSA.

Is the WSA an unusual ecotype, not common in the wilderness system? The WSA is classified as a grama-wheatgrass-needlegrass ecotype. There is currently only one representative in the National Wilderness Preservation System (NWPS) of this ecotype. There are however, twenty other WSAs containing this ecotype located in eastern Montana. Fifteen are located in the Charles M. Russell National Wildlife Refuge (CMR), have been administratively-endorsed for wilderness and are awaiting congressional action. Five BLM WSAs have been preliminarily recommended for wilderness and are being managed to preserve their natural value. The addition of Bitter Creek to the NWPS would be an advantage to balancing the diversity of the national system, but because of the number of other units pending designation, it would not be a major consideration affecting the suitability of the WSA.

The need for additional wilderness opportunities for urban dwellers, within five hours driving time of the

study, is not a significant consideration in overall suitability for wilderness designation. As summarized in Table 3.9, abundant wilderness is available in the Montana, North Dakota region. The Missouri River Breaks area presently has one designated wilderness (UL Bend) and fifteen other study areas administered by the U.S. Fish and Wildlife Service which have been administratively-endorsed for wilderness and are awaiting congressional action. There has been only minimal support for additional wilderness by local residents in central and eastern Montana, based on thousands of letters and comments received since the inventory began in 1978. The local groups from Glasgow and other small towns within fifty miles of Glasgow have voiced strong opposition to additional wilderness in the area. There has been very limited support from state and national wilderness advocacy groups for the designation of Bitter Creek.

## PLANNING CRITERIA

Two planning criteria, or guidelines for evaluation of public concerns, were developed by BLM. The two criteria are:

### *Criterion No. 1 - Evaluation of Wilderness Values*

This criterion includes considering the extent that each of the following components contribute to the overall value of an area for wilderness purposes.

A. Mandatory wilderness characteristics: the quality of the area's wilderness characteristics size; naturalness and outstanding opportunities for solitude or primitive recreation.

B. Special features: the presence or absence and the quality of the optional wilderness characteristics; ecological, geological, or other features of scientific, educational, scenic, or historical value.

C. Multiple resource benefits: the benefits to other multiple resource values and uses which only wilderness designation of the area could insure.

D. Diversity in the National Wilderness Preservation System: consider the extent to which wilderness designation of the area under study would contribute to expanding the diversity of the National Wilderness Preservation System from the standpoint of each of the factors listed below:

- (1) Expanding the diversity of natural systems and features, as represented by ecosystems and landforms.
- (2) Assessing the opportunities for solitude or primitive recreation within a day's driving time (five hours) of major population centers.
- (3) Balancing the geographic distribution of wilderness areas.

### *Criterion No. 2 - Manageability*

This criterion means the area must be capable of being effectively managed to preserve its wilderness character.

## WILDERNESS MANAGEABILITY OF THE STUDY AREA

Based on the wilderness values of the WSA as described in Chapter 3, and the impacts on these wilderness values analyzed in Chapter 4, the manageability of the WSA has been determined as follows:

The WSA is manageable as wilderness only under the Enhanced Wilderness Manageability Alternative. Under the All Wilderness and Bitter Creek East Alternatives, the number of state and private inholdings which could require access and the lack of topographic barriers to prevent vehicle use in conjunction with adjacent private land and two interior roads, make wilderness management very impractical. If designated, the management conflicts would be reduced if state and private inholdings could be acquired. Post-FLPMA oil and gas leases and the high probability of finding natural gas and local resistance to wilderness all combine to make the area potentially unmanageable for wilderness values.

## THE ALTERNATIVES SELECTED

The interdisciplinary team selected the following four alternatives after their review of public comment, identification of resource values, evaluation of existing and potential resource conflicts and application of the wilderness planning criteria.

1. Proposed Action (No Wilderness Alternative) — no acreage would be recommended for wilderness designation. This constitutes the continuation of existing management or "no-action" alternative.
2. All Wilderness — all 59,660 acres would be recommended suitable for wilderness.
3. Bitter Creek East Wilderness — recommends 39,950 acres as suitable for wilderness, while 19,710 acres would be recommended unsuitable.
4. Enhanced Wilderness Manageability — recommends 26,000 acres within Bitter Creek East as suitable for wilderness designation, while 33,660 acres would be recommended unsuitable.

These four alternatives provide a reasonable range of possible wilderness recommendations. The No Wilderness Alternative is management's proposed action developed as a result of the planning process (see Table 2.1 for acreage summary by each alternative).



# CHAPTER 2

## ALTERNATIVES

### INTRODUCTION

Chapter 2 describes the proposed action and the alternatives considered for the Bitter Creek Wilderness Study Area (WSA) (Figure 2.1). In addition, a table (T2.2) at the end of this chapter summarizes the environmental impacts of the proposed action and each alternative.

A reasonable range of alternatives must be considered because of Council of Environmental Quality (CEQ) regulation 1502.14 and requirements of the Bureau of Land Management's (BLM) Wilderness Study Policy. These regulations require that two of these alternatives be:

The No Wilderness Alternative (No Action) which analyzes the effects of not designating any part of Bitter Creek as suitable for wilderness. If Congress selects this alternative, present management would continue in Bitter Creek without any wilderness constraints.

The All Wilderness Alternative analyzes the effects of designating the entire WSA (three roadless segments) as suitable for wilderness designation.

In addition to the required alternatives, one or more partial wilderness alternatives can also be considered. Partial wilderness alternatives allow portions of a WSA to be recommended either suitable or non-suitable. The two guidelines used to arrive at the partial wilderness alternatives were: to resolve conflicts between wilderness and other resource uses, and to improve the long-term wilderness manageability of the WSA.

Resource conflicts would arise when other uses reduce opportunities for solitude or primitive recreation or impair (see Glossary) natural values. The manageability of a study area is affected by the locations and types of inholdings; valid, existing rights; the presence of "cherry-stemmed" or other segmenting roads; the presence of identifiable boundaries; the potential to remove unneeded manmade features; and the type and location of outside influences.

### DESCRIPTION OF ALTERNATIVES, INCLUDING THE PROPOSED ACTION

Six alternatives were identified during the scoping and planning process. Two of the six were considered by the interdisciplinary team and management, but were not recommended for detailed environmental analysis. A description and the rationale for not analyzing these two alternatives (Bitter Creek South and Bitter Creek West) is given in Appendix 2.1.

The four alternatives recommended for analysis are described below and Table 2.1 summarizes each alternative by acreage. Also, the on-the-ground impacts of each alternative to each environmental concern are discussed here. Table 2.2 summarizes these environmental impacts.

#### Proposed Action (No Wilderness Alternative)

This alternative recommends no part of the Bitter Creek WSA be recommended for wilderness designation and emphasizes resource production rather than preservation. If Congress selects this alternative, management, as prescribed in the Valley Management Framework Plan (MFP), which is the current management situation, would continue on the 59,660 acres.

#### Recreation Management Actions

With this alternative all the 59,660 acres and six vehicle ways totaling 19.5 miles would remain open to provide motorized access for the general public and the elderly and/or disabled. This motorized public access permits use of the public lands for recreation interests such as hunting, fishing, sight seeing, snowmobiling and visiting homesteads. There are no projected recreational developments for the WSA.

TABLE 2.1  
Summary of Alternatives by Acreage

| No Wilderness<br>(Proposed Action) |              | All Wilderness |              | Bitter Creek East<br>Alternative |              | Enhanced Wilderness<br>Manageability |              |
|------------------------------------|--------------|----------------|--------------|----------------------------------|--------------|--------------------------------------|--------------|
| Suitable                           | Non Suitable | Suitable       | Non Suitable | Suitable                         | Non Suitable | Suitable                             | Non Suitable |
| 0                                  | 59,660       | 59,660         | 0            | 39,950                           | 19,710       | 26,000                               | 33,660       |

Source: BLM, 1983



TABLE 2.2  
SUMMARY OF IMPACTS  
Bitter Creek

|   | Proposed Action<br>(No Wilderness)  | All Wilderness  | Bitter Creek East  | Enhanced Wilderness   |
|---|---|---|--|---|
| IMPACTS ON WILDERNESS VALUES                            | The naturalness of the area would be reduced on 20% of the WSA from chiseling projects, reservoir construction, and fencing. Opportunities for solitude and primitive unconfined recreation would be reduced on 40% of the WSA by natural gas development (75 wells) and use of internal road system. | The naturalness of the WSA would be reduced on 10% from reservoir construction and maintenance on existing RI projects. Opportunities for solitude and primitive unconfined recreation would be reduced on 20% by use of internal road system.            | The naturalness of the WSA and opportunities for solitude would be reduced on 5% of the suitable portion from use of boundary roads. These values would be reduced on 30% of nonsuitable portion due to natural gas well drilling activities (25 wells).                           | For the 26,000 acre roadless area, the naturalness and opportunities for solitude would be enhanced. These values would be reduced on 25% of nonsuitable portion due to drilling of 35 gas wells and use of ORVs.                                   |
| IMPACTS ON ACCESS FOR ELDERLY/DISABLED                  | There would be no impact on access for elderly/disabled.  | Access for elderly/disabled would decline from 100% to zero.  | Access for elderly/disabled would decline by 60%.  | Access for elderly/disabled would decline by 40%.   |
| IMPACTS ON ACCESS LEVELS FOR ALL RECREATIONAL INTERESTS | There would be no impact on access for all recreational interests.  | Access levels for hunters would decline by 56% and by 14% for other recreational interests.   | Access levels for hunters would decline by 50% and by 14% for other recreational interests.  | Access levels for hunters would decline by 40% and 14% for others.  |
| IMPACTS ON RANGE IMPROVEMENT PROJECTS                   | There would be no impact on range improvement projects.   | Maintenance on RI projects could continue but the six permittees would incur additional costs of \$530 and up to an additional 640 hours of labor annually. The three reservoirs would be constructed but 2,310 acre chiseling project would not be done. | Maintenance on RI projects could continue but the six permittees would incur an additional cost of \$450 and up to 460 hours of labor annually. The chiseling project on 1,310 acres and construction of 3 reservoirs would be done. No chiseling would be allowed on 1,000 acres. | Maintenance on RI projects could continue but the five permittees would incur an additional cost of \$360 and up to 260 additional hours of labor annually. The chiseling project on 2,310 acres and construction of 3 reservoirs would be allowed. |
| IMPACTS ON AMOUNT OF NOXIOUS PLANT ACREAGE              | There would be no impact on amount of noxious plant acreage.  | Continued treatment would maintain infestation at 2 acre size.  | Same   | Same  |
| IMPACTS ON MULE DEER POPULATIONS                        | There would be no impact on mule deer population levels. Displacement would occur temporarily while natural gas well development occurred.  | Mule deer populations would increase from a range of 8-10 per square mile to 11-13 per square mile.   | Same   | Mule deer population would increase from a range of 8-10 per square mile to 9-11 per square mile.   |
| IMPACTS ON COYOTE POPULATIONS                           | No impact   | There would be no significant change in coyote population.  |  |   |
| IMPACTS ON NATURAL GAS DEVELOPMENT                      | 75 gas wells would be drilled. There would be no impact on gas development levels.  | No gas wells would be drilled. The opportunity to drill 75 wells would be foregone.   | 25 gas wells would be drilled. The opportunity to drill 50 wells would be foregone.  | 35 gas wells would be drilled. The opportunity to drill 40 wells would be foregone.   |
| IMPACTS ON DEVELOPMENT OF OTHER MINERALS                | The exploration and development for sand, gravel, or bentonite would be allowed. No impact.   | No development or exploration for other minerals would be allowed.  | No development on 39,950 acres, but would be permissible on remaining 19,710 acres.  | No development or exploration on 26,000 acres, but permissible on the other 33,660 acres.   |

## Range Management Actions

With this alternative all proposed range improvements, approximately 22 chiseling projects covering 2,310 acres and 3 new reservoirs enclosed by 1/4-mile of fence each (total 3/4 mile) would be constructed and maintained (Figure 3.1). A total of 7690 AUMs would be available for forage. This is an increase of 5 percent or 373 AUMs from the chiseling projects.

The six grazing permittees would continue to have unrestricted motorized vehicle use of all the acreage and the 19.5 miles of vehicle ways in this WSA. There would be no change in the number of authorized grazing permits.

There are currently 44 reservoirs, 1 spring development, a 2-mile buried pipeline with 2 stock tanks, 1 corral, and 61.9 miles of fence in the study area. There would be no change in the method of use or repair of these improvements.

## Vegetation Management Actions

There are approximately 2 acres of leafy spurge in the study area (Figure 3.1) which would continue to be treated (chemically, biologically, mechanically, by grubbing or by fire) on a yearly basis as allowed in the BLM Northwest Area Noxious Weed Control Program EIS, the Programmatic Environmental Assessment for Containment/Eradication of Noxious Plants in the Lewistown District and the site specific Pesticide Use Proposals.

## Wildlife Management Actions

The wildlife habitat improvement projects, which include 20 nesting islands and approximately 1 mile of fence around 4 reservoirs would be implemented. These 1/4 mile fencing projects around the four reservoirs would keep livestock from grazing the valuable riparian areas to within 100 feet of the water's edge and provide cover for waterfowl and upland game birds.

## Minerals Management Actions

The entire 59,660 acres would be open to oil and gas leasing. The natural gas resource has a high potential rating in the GEM report. Presently there are no applications to drill within the WSA, nor has a successful well been drilled in or adjacent to the WSA. If a natural gas field was developed, there would be a potential maximum of 8 producer wells within the WSA. This is based on current allowable spacing requirements used on nearby Bowdoin Natural Gas Field (one well per section) and the success ratio of having only 1 out of 10 wells drilled being a producer. To service these wells it is estimated that about 50 miles of roads, 30 miles of gathering lines, and a 50-mile major trunk line would be constructed. An additional 67 exploratory wells would be drilled requiring about 150 miles of access roads. There would be a total of 75 natural gas wells drilled within the WSA.

The entire study area would be available for exploration and development for bentonite and sand and gravel. The mineral report prepared by Tetra-Tech stated there is a moderate probability for bentonite and a low probability for sand and gravel to occur in the WSA. There's a very low potential that either would be developed.

## All Wilderness Alternative

The All Wilderness Alternative recommends the entire WSA, consisting of three roadless segments totaling 59,660 acres, as suitable for wilderness designation and represents the maximum acreage that could be recommended for wilderness designation. This alternative emphasizes the preservation of identified wilderness values over the production of other resources which are, or may be present in the area.

## Recreation Management Actions

This alternative would close the 59,660 acres and six vehicle ways totaling 19.5 miles to motorized public access. There are no projected recreational developments for the entire WSA.

## Range Management Actions

With this alternative, three reservoirs with a total of 3/4 mile of fence would be constructed but must meet wilderness non-impairment criteria (see Glossary).

It would restrict motorized vehicle use on all the acreage including 19.5 miles of vehicle ways in the WSA except for emergency repair of range improvement projects or for livestock emergencies such as sickness. There would be no change in the number of permittees, authorized grazing permits, or in the 7317 AUMs and permittees would have use of all existing range improvement projects. However, maintenance on these projects would have to be in the manner least impairing to wilderness values.

## Vegetation Management Actions

Noxious plants would be controlled if they become a threat to lands adjacent to the WSA or begin to spread within the study area. The methods of control would be limited to grubbing with hand tools or to chemical applications. The guidelines for control would be the same as those discussed in the No Wilderness Alternative.

## Wildlife Management Actions

This alternative would close the 59,660 acres and six vehicle ways totaling 19.5 miles to motorized public access for hunting mule deer and/or other game animals and coyotes.

The Animal Damage Control Unit of the Department of Agriculture would be authorized to use vehicles and/or aircraft, on a case-by-case basis, to control coyote populations if necessary.

Wildlife habitat improvement projects (20 nesting islands and approximately 1 mile of fence around 4 reservoirs) would be constructed and must conform to applicable non-impairment criteria. These 1/4 mile fencing projects around the four reservoirs would keep the livestock from grazing the valuable riparian areas to within 100 feet of the water's edge and would provide cover for waterfowl and upland game birds.

## Minerals Management Actions

The 8 post-FLPMA leases (covering 7,500 acres) would not be explored or developed. New leases would not be issued as



the existing ones expire. The remaining 52,160 acres would not be open to oil and gas leasing.

None of the WSA would be available for bentonite or sand and gravel development. No leases would be issued for bentonite in the entire 59,660 acre WSA. The unit would be closed to the sale of sand and gravel also.

## Bitter Creek East Alternative

This alternative recommends that the 39,950 acre eastern segment be designated as wilderness while the remainder of the WSA (19,710 acres) remain available for other multiple use management.

The boundary of Bitter Creek East is formed by public and private legal subdivisions on the north and primarily by legal subdivisions and a ranch access road on the east. The southern boundary is formed along the Northern Border Pipeline corridor and access road and the west boundary is formed by a ranch and recreational access road. These boundaries conform in most places to topographic features. Bitter Creek East was identified in the Montana Wilderness Inventory Final Decision Bitter Creek as Segment D.

This alternative recommends only the area with the highest wilderness values for wilderness designation, while eliminating some, but not all of the potential resource conflicts associated with the All Wilderness Alternative. The area in this alternative is the most natural appearing part of the Bitter Creek WSA. The range developments (reservoirs and fences) are scattered and mainly located near the boundaries and in the northern 1/3 of the segment.

The highly eroded nature of the lands in this alternative offer a stark badlands vista inhabited by a variety of wildlife, particularly mule deer. The Bitter Creek East study area is primarily an eroded basin surrounded by benchlands which are privately owned.

## Recreation Management Actions

This alternative would close 39,550 acres and four vehicle ways, totaling 12.5 miles, to motorized public access. Motorized vehicle access for the elderly and/or disabled would be curtailed in this segment.

The 19,710 acres and two vehicle ways totaling 7.0 miles in the nonsuitable segment would remain open to motorized access for the general public and the elderly and/or disabled.

## Range Management Actions

None of the proposed range improvements apply to this suitable segment.

This alternative would restrict motorized vehicle use on 39,950 acres and four vehicle ways totaling 12.5 miles, except for emergency repair of range improvement projects or for livestock emergencies such as sickness. There would be no change in the number of authorized grazing permits in this segment. Permittees would have use of all the existing range improvement projects (25 reservoirs, 44 miles of fence, 1 spring development, and a 2-mile buried water pipeline with 2 tanks) in this segment. However, maintenance on these projects would have to be done in the manner least impairing to wilderness values.

The remaining 19,710 acres and two vehicle ways totaling 7.0 miles would remain open to traditional use by grazing permittees. The proposed range improvements in this nonsuitable segment (3/4 mile of fence around 3 reservoirs and chiseling on 1,310 acres) would be constructed and maintained as funding and planning allow.

## Vegetation Management Actions

Noxious plants on this 39,950 acre suitable segment would be treated if they become a threat to adjacent lands or begin to spread within this segment. The methods of control would be limited to grubbing and chemical applications in this segment. The guidelines for control would be the same as those discussed in the No Wilderness Alternative.

Noxious plants in the nonsuitable segment would be chemically controlled as discussed in the No Wilderness Alternative.

## Wildlife Management Actions

This alternative would close 39,950 acres and four vehicle ways, totaling 12.5 miles, to motorized public access.

No increase in coyote numbers would be expected as a result of this alternative. However, the Animal Damage Control Unit of the Department of Agriculture would be authorized to use vehicles and/or aircraft, on a case-by-case basis, to control coyote populations if necessary.

The proposed wildlife habitat improvement projects included in this suitable segment (13 nesting islands and 3 reservoir fencing projects of approximately 3/4-mile) would be allowed, but must meet non-impairment criteria. These 1/4 mile fencing projects around the three reservoirs would keep the livestock from grazing the valuable riparian areas to within 100 feet of the water's edge and would provide cover for the waterfowl and upland game birds.

The remaining 19,710 acres and two vehicle ways totaling 7.0 miles in the nonsuitable segment would remain open to traditional motorized hunting methods for game animals and coyotes.

The remaining wildlife habitat improvement projects (7 nesting islands and 1 reservoir fencing project totaling approximately 1/4-mile) would be constructed in the segment recommended as nonsuitable.

## Minerals Management Actions

In the 39,950 acre segment recommended as suitable, the 8 post-FLPMA oil and gas leases, covering 7,500 acres in this segment, would not be explored or developed. New leases would not be issued as existing ones expire. The remaining 32,450 acres would be closed to oil and gas leasing.

None of the 39,950 acres recommended as suitable would be available for bentonite or sand and gravel exploration and development.

There would be no special restrictions on the natural gas leases in the 19,710 acre segment recommended nonsuitable with this alternative and new leases could be issued as existing ones expire. There would be a potential of three producer wells out of the 25 drilled in this segment. Also, bentonite and sand and gravel could be explored for and developed in this segment.

## Enhanced Wilderness Manageability Alternative

This alternative emphasizes enhanced wilderness manageability of the study area as wilderness over the long term. It recommends that a 26,000 acre portion of the Bitter Creek East Alternative be designated as wilderness and that the remaining 33,660 acres in the WSA be determined nonsuitable and available for other multiple use management.

The boundary of the Enhanced Wilderness Manageability Alternative is formed along a constructed vehicle way and the south bank of the East Fork of Willow Creek. The east boundary is the same as Bitter Creek East, along a ranch road and legal subdivisions with the exception of following a small cherry-stemmed road to and around a private inholding in T. 34 N., R. 38 E., Sections 33 and 34. The southern and western boundaries are the same as those described in the Bitter Creek East Alternative, with the exception of 180 acres in T. 34 N., R. 37 E., Section 35 which is not included in this alternative.

The Enhanced Wilderness Management Alternative retains the outstanding wilderness values described in the Bitter Creek East Alternative while eliminating many of the resource conflicts and improving the potential for long term wilderness manageability. The major change in this alternative is the exclusion of 1,040 acres of non-Federal inholdings and the removal of an extremely irregular boundary on the north, replacing it with a physiographic feature, the East Fork of Willow Creek.

### Recreation Management Actions

With this alternative 26,000 acres and four vehicle ways totaling 12.5 miles would be closed to motorized public access.

The management emphasis of this alternative would enhance non-motorized recreational opportunities and experiences in the segment recommended suitable for wilderness designation.

The remaining 33,360 acres and two vehicle ways totaling 7.0 miles would remain open to motorized access for the general public, including the elderly and/or disabled.

### Range Management Actions

No range improvements are proposed in this suitable segment.

This alternative would restrict motorized vehicle use on 26,000 acres and four vehicle ways totaling 12.5 miles, except for emergency repair of range improvement projects or for livestock emergencies such as sickness. There would be no change in the number of authorized grazing permits in this segment. Permittees would have use of all the existing range improvement projects (15 reservoirs, 25.25 miles of fence, 1 spring development, and a 2-mile buried pipeline with 2 tanks) in this segment. However, maintenance on these projects would have to be done in the manner least impairing to wilderness values.

The remaining 33,660 acres and two vehicle ways totaling 7.0 miles in the WSA would remain open to traditional motorized range and livestock management methods. The proposed range improvements in this nonsuitable segment

(3 reservoirs with 3/4 mile of fencing and 22 chiseling sites on 2,310 acres) would be constructed and maintained. A total of 7690 AUMs would be available for forage. This is an increase of 5 percent or 373 AUMs from the chiseling projects.

### Vegetation Management Actions

Noxious plants would be treated if they become a threat to lands adjacent to this 26,000 acre suitable segment or begin to spread within this segment. The methods of control would be limited to grubbing with handtools or to chemical applications. The guidelines for control would be the same as those discussed in the No Wilderness Alternative.

Noxious plants in the nonsuitable segment would be treated as discussed in the No Wilderness Alternative.

### Wildlife Management Actions

This alternative would close 26,000 acres and four vehicle ways totaling 12.5 miles to motorized public access for hunting mule deer and/or other game animals and coyotes.

The Animal Damage Control Unit of the Department of Agriculture would be authorized to use vehicles and/or aircraft, on a case-by-case basis, to control coyote populations if necessary.

The proposed wildlife habitat improvement projects included in this suitable segment (9 nesting islands and 1 reservoir fencing project of approximately 1/4 mile) would be allowed, but must meet non-impairment criteria. This 1/4 mile fencing project around the reservoir would keep the livestock from grazing the valuable riparian area to within 100 feet of the water's edge and would provide cover for waterfowl and upland game birds.

The remaining 33,660 acres and two vehicle ways totaling 7.0 miles in the nonsuitable segment would remain open to traditional motorized hunting methods for game animals and coyotes.

The remaining wildlife habitat improvement projects (11 nesting islands and 3 reservoir fencing projects of approximately 1/4-mile each) would be allowed in the segment recommended as non-suitable.

### Minerals Management Actions

In the 26,000 acre segment recommended as suitable with this alternative, the 6 post-FLPMA leases covering the 6,100 acres in this segment would not be explored or developed. New leases would not be reissued as old ones expire. The remaining 19,900 acres would be closed to oil and gas leasing.

None of the 26,000 acres recommended as suitable in this alternative would be available for bentonite or sand and gravel exploration and development.

There would be no special restrictions on the oil and gas leases (2 post-FLPMA, 1,400 acres) in the 33,660 acre segment recommended nonsuitable with this alternative and new leases could be issued as old ones expire. There would be a potential of four producer wells from the 35 drilled in this segment. Also, bentonite and sand and gravel could be explored for and developed in this segment.

# CHAPTER 3

## AFFECTED ENVIRONMENT

### CLIMATE

Summer temperatures are hot with maximum temperatures in the high 90° Fahrenheit (F) range. Winters are cold, characterized by many days of sub-zero temperatures. Minimum temperatures have been as low as -59° F.

The wilderness study area (WSA) averages 10-15 inches of precipitation annually. Approximately 83 percent of this precipitation falls during the period between April 1 and September 20 with May and June being the wettest months. In the fall, winter and early spring precipitation falls mostly as snow.

Summer winds have hourly speeds of 7-15 miles per hour (MPH). Strong winds in excess of 60 MPH are not uncommon and may blow for several days at a time.

### AIR QUALITY

Air quality is excellent in Bitter Creek because of the lack of human activity and nearby industry. All public lands have Class II air quality (good) set by the State of Montana. Particulate concentrations are highest during spring and summer due to nearby farm operations (such as plowing) and lowest in the winter.

### TOPOGRAPHY

The Bitter Creek WSA is located in the glaciated Missouri Plateau. The topography consists of flat to gently rolling terrain with rugged denuded badlands terrain in some areas. Elevations within the WSA range from 2,500 feet in the southern part of the area to 3,000 feet in the northern portion. Most of the drainages are intermittent tributaries of Bitter Creek, which drain south into the Milk River.

### RECREATION

Big game, upland bird and waterfowl hunting are the major recreational activities in the WSA. Based on an interpolation of the results of aerial overflights by Bureau of Land Management (BLM) during hunting season, approximately 450 hunter days are spent in the area annually. The area is known locally as a source of trophy mule deer bucks. Reservoirs in the WSA provide waterfowl habitat and some limited hunting opportunities. One of the reservoirs (Gay) is a trout fishery and receives approximately 100 fisherman days per year.

Off-road vehicle (ORV) use, usually associated with hunting, is common in the WSA. This use is restricted to designated roads, trails, and vehicle ways. Public input during the wilderness inventory and study process pointed out

current ORV use in the WSA for hunting, sightseeing, and visiting ancestral homestead sites by homesteader descendants. A number of two-wheeled tracks in the WSA attest to ORV travel. Local residents also use the WSA for snowmobiling during good snow years.

Other possible recreational uses include camping, backpacking and nature study. Participation in these sports is limited by inclement weather and by the availability of better opportunities much closer to population centers.

Although no visitor use statistics, other than for hunting, exist for Bitter Creek, BLM Recreation Planners estimate that approximately 150 non-hunting visits occur yearly in the WSA. Of these, approximately 100 visits are associated with fishing in Gay Reservoir and approximately 5 are visits by the elderly and/or handicapped individuals.

### Projected Visitation Trends in the WSA

The UL Bend Wilderness Area (approximately 100 miles southwest of Bitter Creek), managed by the United States Fish and Wildlife Service (USFWS), is the component of the National Wilderness Preservation System most like Bitter Creek WSA in ecotype, regional proximity and probable usage.

Before designation, UL Bend saw some vehicle-based visitation by fishermen traveling to Fort Peck Lake and by hunters during the big game season (October and November). Wilderness designation restricted vehicle use and visitation dropped. The USFWS states usage is presently up to pre-designation levels but is still very limited. Present users include boaters during the summer months and several hunting parties who pack into the area during the fall.

This visitation pattern could be repeated if the Bitter Creek WSA were designated as wilderness and vehicle-based hunting eliminated. Non-motorized hunter use would increase but not to existing levels. Given the size and openness of this WSA, which makes it less conducive to walk-in hunting, designation as wilderness would probably decrease the overall recreational use from existing levels.

There are few special features in the WSA which would attract visitors other than those looking for specific wilderness experiences. The type of users would change as vehicle-based recreationists would be replaced by foot or horseback users would replace vehicle based recreationists. People from outside the state would probably be more likely to visit this area than prior to designation.

### CULTURAL

Information about cultural resources in the WSA has been collected mainly from clearances conducted for range projects. Other archeological fieldwork (random sampling) has also contributed data, providing information about the

number, quality and type of prehistoric and historic features present in the study area.

Remnants of human occupation dating back 12,000 years can be found in the WSA and the surrounding region. Prehistoric people who frequented the areas were hunters and gatherers. They shifted residences in response to seasonal change in food resource opportunities and the never-ending needs of defense, shelter, water, fuel and raw materials for tool production. These groups were usually small, possessing only what appears to be a limited set of stone, wood and bone tools. Bison eventually became a major food source as newer techniques of trapping the animals were developed.

The remaining traces of these early people include tipi rings, lithic scatters, bison butchering sites and isolated stone tools and approximately 50 of these prehistoric sites have been identified in the WSA. The majority of these have been discovered in the northern and southern most portions of the WSA.

Approximately 8,000 acres within the WSA are land utilization lands. These lands were in private ownership for a time then reverted back to public ownership. A small percentage (probably less than 5 percent) of these 8,000 acres were improved by homesteaders. These improvements consisted mostly of picking rock and plowing. Today there is little evidence of these activities other than an occasional rock pile.

## WATERSHED/SOILS

The Bitter Creek WSA consists of two distinct soil types. The first type includes approximately 70 percent of the study area and consists of shallow to moderately deep acid clay soils on moderately steep to very steep shale uplands. These lands consist of dissected drainage systems with shale outcrops on the ridge crests and steep side slopes. These are marginal rangelands with only 35-45 percent ground cover. The surface is characterized in many places by deposits of glacial rock. These soils are characterized by moderate to high runoff and the erosion potential is considered moderate to severe. The second type includes approximately 30 percent of the area and contains high bench

remnants of continental glacial till. Soils are deep clay loam glacial till mantle on nearly level to gently rolling topography. The soils support substantially more ground cover and higher production potential. Runoff and erosion potential are both moderate.

## Water Quality

There are no ephemeral streams in Bitter Creek. Water plays a minimal role in the recreational use of this area. Forty-three man-made reservoirs, the majority being under 5 surface acres, are important to both domestic livestock and the wildlife in this WSA.

Waters in the WSA contain high concentrations of ionic salts (highly saline) and are rated as fair to poor depending on the time of year and the source. This water is used by livestock and wildlife.

## GRAZING MANAGEMENT

There are presently six operators with grazing permits in the Bitter Creek study area. There are 7,317 animal unit months (AUMs) (Glossary) of grazing privileges within the WSA. Table 3.1 lists the allotment names and numbers, seasons-of-use and AUMs. Figure 3.1 shows the allotment boundaries within the study area.

Table 3.2 shows the type and number of proposed range improvements for each allotment in the WSA. The water developments are proposed to improve distribution of livestock to better utilize the range resource. The chiseling operation is proposed to improve vegetation production and improve plant vigor.

Livestock is overutilizing important grasses and other vegetation along the bench tops and scarp in the Southfork Bitter Creek Allotment No. 4054 (Figure 3.1) and current utilization levels are heavy-severe (61-80 percent).

The western 1/3 of the Upper Canyon Creek Allotment No. 4071 (Figure 3.1) is being underutilized by livestock due to poor distribution. It is estimated the area is receiving slight-light use (0-40 percent). Utilization is determined by the amount of the current year's growth removed.

TABLE 3.1  
Grazing Preference in the Bitter Creek WSA

| Allotment Name       | Management Status | Allotment Number | Season        | Federal AUMs |      |
|----------------------|-------------------|------------------|---------------|--------------|------|
|                      |                   |                  |               | Allot.       | WSA  |
| Anderson-Ojuel       | E                 | 4041             | 05/15 — 08/31 | 2572         | 425  |
| Eastfork Willow Cr.  | E                 | 4053             | 06/25 — 10/03 | 2013         | 1589 |
| Southfork Bitter Cr. | P                 | 4054             | 08/31 — 10/29 | 1333         | 1333 |
|                      | P                 | 4055             | 04/15 — 08/30 | 2314         | 284  |
|                      | Pot.              | 4056             | 05/16 — 09/20 | 393          | 17   |
| Upper Canyon Cr.     | P                 | 4071             | 04/01 — 10/31 | 1459         | 800  |
| Upper Willow Cr.     | E                 | 4718             | 05/15 — 10/17 | 3944         | 1704 |
| Bitter Cr.           | P                 | 4722             | 03/01 — 02/28 | 439          | 77   |
| Eagles Nest Coulee   | E                 | 4726             | 05/01 — 11/30 | 2823         | 1088 |

E = Existing AMP; refer to the individual AMP for the specific year-to-year season.

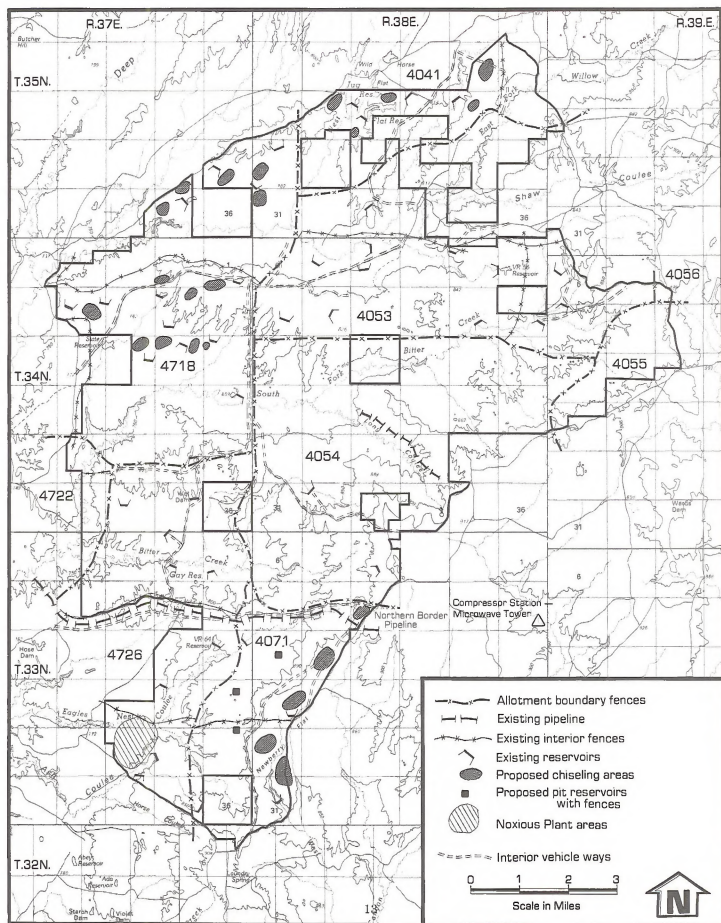
P = Proposed AMP

Pot. = Potential

Source: BLM, 1988



FIGURE 3.1 Resource Conflicts — Bitter Creek WSA



**TABLE 3.2**  
**Proposed Range Improvements**

| Allotment Name and Number   | Fences (Miles) | Reservoirs (Number) | Springs (Number) | Pipelines (Feet) | Chiseling (Acres) |
|-----------------------------|----------------|---------------------|------------------|------------------|-------------------|
| Anderson Ojuel No. 4041     | —              | —                   | —                | —                | 500               |
| Eastfork Willow Cr No. 4053 | —              | —                   | —                | —                | —                 |
| Southfork Bitter Cr.        | —              | —                   | —                | —                | —                 |
| No. 4054                    | —              | —                   | —                | —                | —                 |
| No. 4055                    | —              | —                   | —                | —                | —                 |
| No. 4056                    | —              | —                   | —                | —                | —                 |
| Upper Canyon Cr. No. 4071   | —              | 3                   | —                | —                | 450               |
| Upper Willow Cr. No. 4718   | —              | —                   | —                | —                | 1,360             |
| Bitter Creek No. 4722       | —              | —                   | —                | —                | —                 |
| Eagle Nest Coulee No. 4726  | —              | —                   | —                | —                | —                 |

Source: BLM, 1988

## VEGETATION

The most common plant species in the WSA include western wheatgrass, needleandthread, blue grama, prairie sandreed, native legumes, silver sagebrush, creeping juniper, chokecherries, silver buffaloberry and isolated non-commercial stands of aspen. No commercial timber exists in the area (Appendix 3.1 for a detailed list of plant species).

No rare or endangered plant species are known to exist on public lands in the WSA.

## Noxious and Poisonous Plants

Leafy spurge is the only noxious plant found in the WSA and is found on approximately 2 acres within the WSA. This area has been treated with herbicides which has not allowed the size of this infestation to change.

Plants poisonous to livestock are also found in the WSA but have not posed any major problems to date. These species are cocklebur, greasewood and chokecherry.

## Fire Suppression

The BLM fire suppression program has attempted to minimize fire damage through the use of ground pumpers and fire crews. Historically, this area has had very little fire.

## WILDLIFE

The wildlife found in the Bitter Creek WSA is typical of the eastern glaciated plains. The abundance of some species is attributed to the higher percentage of badlands/breaks landform in this unit than in adjacent areas (Table 3.3). Appendix 3.2 is a detailed list of the animal species common to this area.

### Big Game

Mule deer are abundant throughout the WSA. The badland/breaks landform lends itself to the needs of these deer on a yearlong basis and is especially important as winter habitat. Approximately 26,000 acres are considered important as winter habitat. This habitat is primarily located in

**TABLE 3.3**  
**Wildlife Occurrence &  
Relative Abundance Estimates**

| (Species)               | (No./mille <sup>2</sup> ) |
|-------------------------|---------------------------|
| <b>BIG GAME</b>         |                           |
| Mule deer               | 8.0 — 10.0                |
| Pronghorn antelope      | 0.4 — 0.7                 |
| <b>UPLAND GAMEBIRDS</b> |                           |
| Sage grouse             | 4.1 — 16.4                |
| Sharptailed grouse      | 4.8 — 12.9                |
| Gray partridge          | 0.2 — 0.5                 |
| <b>WATERFOWL</b>        |                           |
| Ducks                   | 8.6 — 14.0                |
| Canada geese            | 0.1 — 0.2                 |
| <b>ENDANGERED</b>       |                           |
| Black-footed ferret     | 0 — 0.01                  |
| Peregrine falcon        | 0 — 0.01                  |
| Bald eagle              | 0 — 0.03                  |

These figures are average population estimates for the entire WSA and include areas of high and low wildlife densities as well as areas considered non-habitat.

Source: BLM, 1984

the Eagle's Nest Coulee, Southfork Bitter Creek and Eastfork Willow Creek drainages.

A few white-tailed deer occur in a small portion of this WSA. The quaking aspen groves around the eastern perimeter of the WSA provide the only suitable whitetail habitat of any consequence within the study area.

Antelope use both the breaks and benchlands of the WSA. Their spring, summer and fall numbers are moderate in this area, probably due to rough topography. However, winter concentrations of pronghorn occur in this WSA as it does provide approximately 8,300 acres of crucial winter habitat. This habitat is similar to the mule deer winter habitat in general location.

Elk have been sighted occasionally near the boundaries of the WSA. These animals are probably transients from the Missouri Breaks and only passing through, although one or more may remain for sometime.

## Upland Gamebirds

Sage and sharp-tailed grouse can be found in this WSA. Population levels of these two species would best be characterized as moderate. Small numbers and widely scattered flocks of gray, or Hungarian partridge also occur within the WSA.

The sage grouse are associated with the silver sage stands of the drainage bottoms and benchlands. The sharp-tails occur along the buffaloberry-lined coulees and adjacent grassy uplands. The Hungarian partridge can occasionally be found in any of the habitat types, but prefer the farmland areas along the borders of the WSA.

## Waterfowl

All the geese, ducks and shorebird species common to the eastern glaciated plains portion of Valley County can be found in the Bitter Creek area (with the exception of the mountain plover, which occurs only in south Valley County). Approximately 10 waterfowl nesting islands have been constructed to improve nesting habitat. Up to 20 additional nesting islands are possible.

## Furbearers

The principal furbearing mammals in this WSA are the muskrat, beaver, badger, fox and infrequently, mink. No density/occurrence data are available. Bobcat occurrence is possible but unlikely as there have been no verified sightings. Skunks and weasels also occur in Bitter Creek.

## Predators

The most numerous and economically important predator is the coyote with heavy harvest for fur occurring during favorable market and snowfall years. No trend information is available.

## Nongame Species

The entire complement of nongame species which use the eastern glaciated plains are found in the WSA. This includes 11 species of reptile/amphibians, 113 species of birds and 19 species of mammals.

## Fisheries

One significant fishery occurs in the study area: Gay Reservoir, T. 33 N., R. 37 E., Section 2. The pond is stocked with rainbow trout and receives moderate recreation use (estimated 100 fisherman days annually).

### Threatened/Endangered Species

The BLM consulted with the U.S. Fish and Wildlife Service about the question of threatened and endangered species (Appendix 3.3).

Migrating bald eagles pass through this area. There has been one documented sighting in the WSA. Peregrine falcons may migrate through or could occur in areas such as Eagle's Nest Coulee. None have been sighted and suitable nesting habitat is very limited.

There is limited black-footed ferret habitat in this WSA but no sightings have been made.

## GEOLOGY

The geologic history of the Bitter Creek WSA is one of repeated advances and retreats of sea waters. Marine deposits of sandstone, shale and limestone were formed over the base Precambrian, or earliest rock, 225 million years ago. During the fluctuation of the seas, dead and decaying marine life may have been trapped in pockets. These trapped materials under the right conditions may have been converted to hydrocarbons. The number of additional advances and retreats of the sea 135-180 million years ago followed by repeated uplifting, folding and faulting resulted in additional thick terrestrial sediments being deposited deep in the earth's surface. These deposits also, under the right conditions, could have been converted to hydrocarbons. During more recent geologic history volcanic activity deposited volcanic ash throughout the area. During the last 2-3 million years, the region has periodically been covered by glaciers. The study area has remnants of this glaciation with numerous deposits of granitic rocks carried with the glaciers from the north. Appendix 3.4 shows the geologic formations common to the WSA.

## ENERGY AND MINERAL RESOURCES

There is no known mineral production within the Bitter Creek WSA. However, the area does have varying potential for bentonite, uranium, natural gas, sand and gravel, and geothermal energy sources.

### Resource Potential

In order to better evaluate the occurrence or potential occurrence of these energy and mineral resources a two-part resource classification system was adopted. Each resource or potential resource received an alpha-numeric classification. The number designation ranged from 1-4 and indicates the favorability of the geologic environment, geologic process and mineral occurrences for the presence of a particular resource or group of resources (with the number 4 representing the highest favorability). The letter designation ranged from A-D and indicates the level of confidence assigned to the numerical designation (with the letter D representing the highest level of confidence). Appendix 3.5 is an explanation of the rating system.

The following probabilities and classifications for potential energy and mineral resources were provided, by contract, by Tetra Tech Incorporated in 1983: Bentonite was given a moderate probability or a 3C classification (while bentonite could occur on approximately 55,950 acres, there are no identified deposits and no indication of economic interest); sand and gravel were given a low probability or a 2B classification; uranium was given a low probability or a 2B classification; gas was given a high probability or a 4D classification; and geothermal energy sources were given a low probability or a 2D classification.

### Natural Gas

Natural gas is the only energy resource having a high potential rating in the WSA.

Gas is known to accumulate in thin sandstone stringers of the Colorado Shale of the Upper Cretaceous age. Any upward migration of gas, from a generating zone, would be trapped in these sand stringers between impermeable bentonitic shales along the margins of the Bowdoin Dome south of the WSA (Rice et al., 1980). There would be a maximum potential of 8 producer natural gas wells out of the 75 drilled. No successful wells have been drilled to date. From 1972 to 1981, Valley County's wildcat success rate was 0 percent while adjacent Phillips County's success rate was 15 percent. A detailed examination of well logs would be needed to determine whether suitable horizons for the accumulation of gas exists. For analysis purposes it's assumed that natural gas could occur throughout the 59,660 acre WSA. Presently there are no producing leases in this WSA.

The economics of any gas resources which might be found in the study area are dependent on pressures, volumes, and BTU content. Based on the geology and history of gas development in northcentral Montana, gas reservoirs in the study area can be expected to be of low pressure and low volume. If gas reservoirs of ample volume can be established in the area, a market for this resource would appear to be available through the pipeline system now serving the Bowdoin Dome gas field, 16 miles southwest of the WSA.

## Mineral Location and Leasing

The Federal government owns the mineral rights on all the public land in the study area. Federal minerals are available to the public under the mineral leasing and/or mining and materials sales laws. The WSA is approximately 11 percent leased for oil and gas exploration. These leases occurred after the passage of Federal Land Policy and Management Act (FLPMA) in October of 1976 (post-FLPMA).

In the case of post-FLPMA leases, any exploration or development must not degrade wilderness values in the WSA. Any activities which have the potential to degrade wilderness quality will not be allowed. A wilderness area with a low percentage of post-FLPMA leases would potentially restrict opportunities for leaseholders to explore their leases.

No other minerals (only natural gas) are presently leased in the WSA. There are no known locatable minerals in the study area and no mining claims.

Table 3.4 shows the number and acreages post-FLPMA leases in Bitter Creek. Figure 3.2 details the location of these post-FLPMA leases. The unleased areas will not be leased as long as the study area remains a WSA based on present policy.

## LAND STATUS AND USE

There will probably be no urban residential, commercial or industrial expansion near the WSA and only a small portion of the study area is suitable for farming.

The State of Montana owns all surface and mineral rights on 1,920 acres within the WSA. State lands are subject to development and access requirements outside of Federal jurisdiction. State inholdings are open to mineral and graz-

TABLE 3.4  
Bitter Creek Oil and Gas Lease Status

| Oil, Gas Leases                |        |     |
|--------------------------------|--------|-----|
| PRE-FLPMA                      |        |     |
| Number of Leases in WSA        |        | 0   |
| Area of Leases in WSA          |        | 0   |
| % of WSA in Pre-FLPMA Leases   |        | 0   |
| POST-FLPMA                     |        |     |
| Number of Leases in WSA        |        | 8   |
| Area of Leases in WSA          | 7,500  |     |
| % of WSA in Post-FLPMA Leases  |        | 11% |
| OIL & GAS SIM                  |        |     |
| Acres of WSA in OG SIM         |        | 0   |
| % of WSA in OG SIM             |        | 0   |
| UNLEASED                       |        |     |
| Unleased Acreage               | 52,160 |     |
| % of WSA Unleased              |        | 89% |
| Area in Competitive Bid Leases |        | 0   |
| % of WSA in Competitive Bid    |        | 0   |

Source: BLM, 1988

ing leasing and access to these inholdings would be across public lands. Except for a few stockwatering ponds and vehicle ways, these lands are similar to the surrounding public lands.

There are 1,360 acres of privately-owned land within the study area. Private inholdings are subject to development and reasonable access which would be across public lands. Except for a few stockwatering ponds and vehicle ways, the private inholdings are undeveloped and similar to the surrounding public lands.

Public lands in the WSA total 59,660 acres (none have been surveyed so these figures are approximate). Changes from BLMs Final Decision: Montana Wilderness Inventory - Bitter Creek came from recalculating acreages.

## Withdrawals, Easements and Rights-of-Way

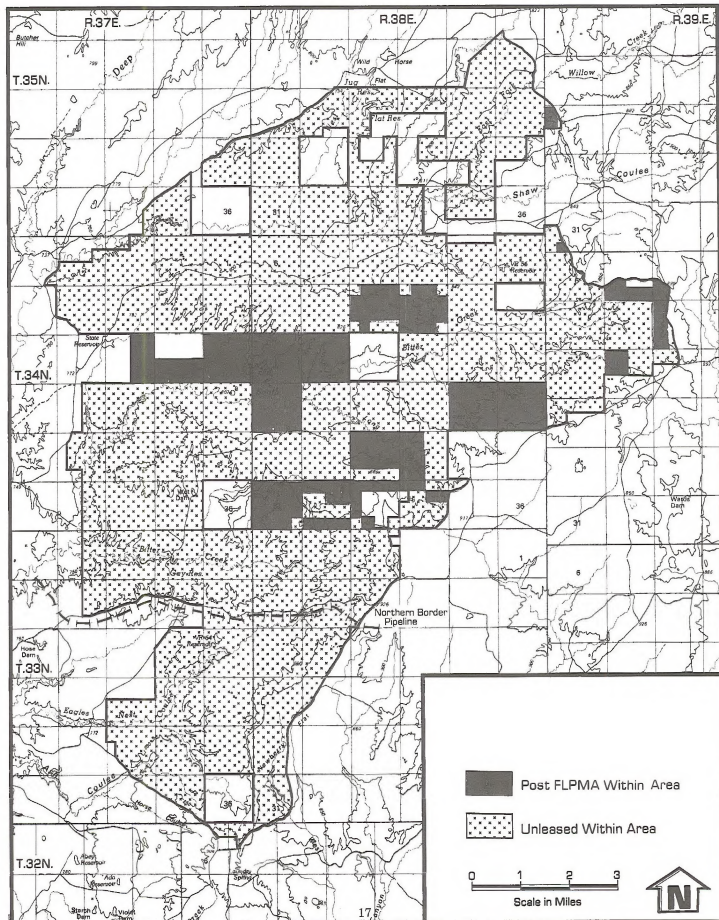
There are no withdrawals or easements inside the WSA. A 4½ mile wide utility corridor includes 16,750 acres of the WSA. At present the Northern Border Gas Pipeline is located within this corridor. There are no known additional applications for utility rights-of-way within the corridor.

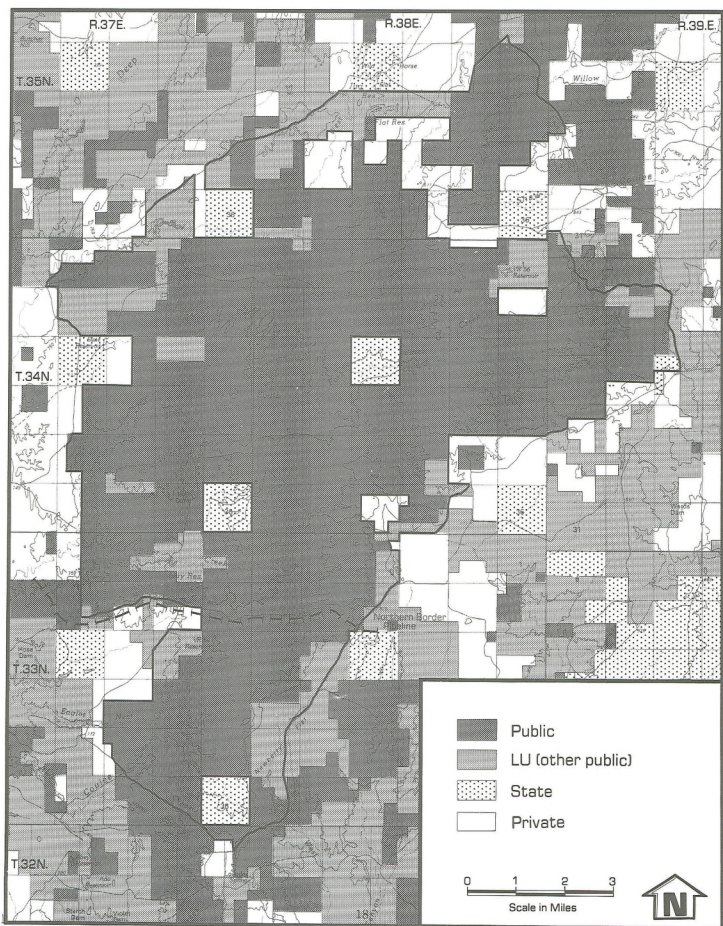
Table 3.5 shows the number of permanent improvements in the WSA.

Table 3.6 shows the landownership adjacent to the study area boundary. Presently all adjacent lands are used for ranching and farming. Figure 3.3 details land status within and immediately adjacent to the WSA. Where county roads form the boundary of the WSA, they provide guaranteed access to the area. However, access through state or private lands adjacent to the WSA is not guaranteed.



**FIGURE 3.2** Leases and Claims Map — Bitter Creek WSA



[illegible]

**TABLE 3.5**  
Permanent Improvements in the WSA

|                       |        |      |
|-----------------------|--------|------|
| Vehicle Ways          | Number | 6    |
|                       | Miles  | 19.5 |
| Fences                | Number | 15   |
|                       | Miles  | 61.9 |
| Reservoirs            | Number | 44   |
| Springs               | Number | 1    |
| Water Pipelines       | Miles  | 2    |
| Corrals               | Number | 1    |
| Gas Wells (dry holes) | Number | 2    |

Source: BLM, 1988

**TABLE 3.6**  
Boundary Ownership in the WSA

| Boundary Ownership |               |        |
|--------------------|---------------|--------|
| Private            | Miles         | 42.25  |
|                    | % of Boundary | 54.3%  |
| State              | Miles         | 7.50   |
|                    | % of Boundary | 9.7%   |
| Federal            | Miles         | 28.00  |
|                    | % of Boundary | 36.0%  |
| Total              | Miles         | 77.75  |
|                    |               | 100.0% |

Source: BLM, 1988

## SOCIAL CONDITIONS

This section describes social conditions in Valley County and is based on the Draft Missouri Breaks Wilderness Suitability Study Environmental Impact Statement (EIS) (1982).

The Valley County population was 10,250 in 1980, a decrease of 10.6 percent from 1970. The decrease was primarily due to high out-migration caused by high unemployment. The out-migration rate is less than in the decade between 1960 and 1970 when the county population decreased by 33 percent due to the closure of the Glasgow Air Force Base. In the future, the population of Valley County is expected to continue to slowly decrease. Glasgow with a 1980 population of 4,455, is the only town with a population above 2,500 in Valley County.

Several sources of information were used in writing the "Local Attitudes and Perceptions" section, including sections of a 1980 survey by ABT Associates, public meetings and letters from interested persons. Much of the discussion specific to this WSA is based on information received from those who took the initiative to make their views known. It is assumed that the attitudes of other area residents would be similar. Nothing is indicated about these concerns becoming reality should the WSA be designated wilderness. The importance of these views is reinforced by an Opinion Research Corporation (ORC) survey completed in 1978. Over 55 percent of a national sample felt the decision about wilderness should be made by the citizens of the states affected.

### Local Attitudes and Perceptions

Residents of Valley County exhibit attitudes and values typical of rural, ranch-oriented societies in the western United States. The rural character of the area is what residents value most about their lifestyle. Specifically, they appreciate the wide open spaces, naturalness, fresh air and solitude. The personal characteristics of other local people (friendliness, independence and industriousness) were frequently mentioned as positive aspects. The residents also valued the lifestyle offered by the local communities: knowing everyone else, the lack of urban problems, relaxed pace and personal freedom. They feel their area is a good place to

raise children and, not surprisingly, every respondent wanted to maintain this lifestyle and the traditional land uses of the area.

Many residents feel the biggest threats to their lifestyle are government interference with local ranches, wilderness designation, high taxes, inheritance taxes and diverting the use of public lands to wildlife or recreation. They want the land controlled at the local level and resent interference from outside the area, whether from agencies or special interest groups. Thus, any change in the status quo proposed by BLM would be questioned.

Substantial local interest in the Bitter Creek WSA has been shown by the extremely high attendance at public meetings and the number of letters and petitions received regarding the issues. Local attitudes toward designation appear overwhelmingly negative. Concerns regarding designation cover a wide variety of issues which are discussed in the Scoping section of Chapter 5.

### State Attitudes

The results of a recent Statewide poll (Keegan, Lenihan, Polzin and Wallwork, 1982) indicate that Montanans overwhelmingly approve of the concept of setting aside certain public and state lands as designated wilderness areas. They like the idea of preserving an area from development so it will be available to future generations. There appears to be widespread support for wilderness areas among all kinds of Montanans. Regardless of age, sex, political preference or place of residence, more than 75 percent of the respondents said they favored wilderness areas. Even among nonusers, 84 percent supported designated wilderness areas. About 40 percent of the Montanans surveyed favored the addition of more wilderness areas in the United States. However, only 25 percent said that Montana needs more wilderness areas. There were no major differences in opinions concerning wilderness between those living in eastern Montana and those in western Montana, where most of the State's wilderness areas are located.

### National Attitudes

National opinion surveys indicate the United States population is divided on the subject of wilderness. In 1977, a



study conducted by Opinion Research Corporation showed 7 percent of the population thought there was too much wilderness, 32 percent too little wilderness and 46 percent thought the amount was about right. Those favoring more wilderness said it is needed for recreation; too much land is being lost to business or industry and wildlife needs more space. Those favoring no additional wilderness felt the land could be better used for buildings, farming and a growing population. In another survey by ORC (1978), Americans rated wilderness fifth (after clean air, clean water, oil and natural gas) as basic resources in short supply. In a 1979 survey conducted by Cambridge Reports, 39 percent of the U.S. population felt there was already enough wilderness, while 37 percent indicated the need for more wilderness (the remaining 23 percent did not express a preference). The results of these surveys vary because of the changing political and economic climate in the United States and because the questions were phrased differently in each survey. It appears that about 33 percent to 50 percent of the population feels there are currently enough wilderness areas while a similar proportion feels there is a shortage.

## Social Well-Being

Indicators of social well-being for Valley County show the positive and negative factors associated with living in a remote rural area (see Draft Missouri Breaks Wilderness Suitability Study/EIS, 1982). Negative factors include a higher number of people per physician, a higher proportion of housing without plumbing for exclusive use and lower per capita income. The positive factors include lower divorce and crime rates and stability in the number of ranches. Information from local residents (see the Local Attitudes and Perceptions section) indicates they feel their area offers a high level of social well-being and the positive aspects of their lifestyle far outweigh the negative.

## ECONOMIC CONDITIONS

### Ranch Related Economic Conditions

In 1978, there were 738 ranches and farms in Valley County (1978 Census of Agriculture, USDC, Bureau of Census). Currently, six individual ranch operations (less than 1 percent of the county total) have permits to graze in the WSA. The ranch operations were placed into two categories according to numbers of livestock and the percentage of total animal unit month needs provided by the WSA. The ranches are cow-calf and yearling operations.

The dependency of ranch operations on WSA forage was determined by the percentage of total required forage the WSA provides. Table 3.7 shows size categories and dependencies of these affected ranch operations. Most of the ranches are large livestock operations with a herd size greater than 500. The average number of AUMs in the WSA for these large operations is 1,600, with an average dependency of 12.7 percent. All the ranches are family owned with a few operations having more than one family associated with the ranch. Livestock sales are the primary source of income, although some operations derive part of their income from cash crops.

Public lands cannot be treated as real property by a permittee. However, the permit does have worth for borrowing

TABLE 3.7  
Size Categories and Dependencies  
of Affected Operations

| Size Category<br>(in cow units) | No. of<br>Ranches<br>in Category | Av. No.<br>AUMs in<br>WSA | Average<br>Dependency |
|---------------------------------|----------------------------------|---------------------------|-----------------------|
| 1—500                           | 2                                | 400                       | 16.2 %                |
| Greater than<br>500             | 4                                | 1,600                     | 12.7 %                |

Source: BLM, 1983

money and adding value to the property at the time of sale. These values could be affected by a change in land status, such as wilderness designation. Agricultural Management and Economic Consulting (AMEC) (1982) contacted a variety of people concerning the issue including representatives of the Federal Land Bank Association, the Farmers Home Administration, the Production Credit Association and several insurance company representatives and realtors. The information collected indicates lenders would place a lower value for lending purposes on an operation containing wilderness.

### Recreation/Wildlife Related Economic Conditions

Since hunting is the primary recreational activity in the study area, this section will focus on the economic implications of hunting deer and antelope. These economic implications fall into two categories. The first is the value of the hunting experience (i.e., the value the recreationist would be willing to pay). The other category is the amount of dollars expended for hunting (i.e., direct expenditures). Since habitat type would not change significantly within the WSA with any of the alternatives, only the expenditures associated with hunting in the WSA are analyzed and not hunting on other lands even if the WSA supplies the habitat.

It is estimated that hunting expenditures for travel, food, lodging and fees (variable expenditures) average \$17 per day for resident and nonresident hunters (1980 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation). Based on 450 hunter days annually in the WSA, hunting deer and antelope generates about \$7,650 annually in direct expenditures in the local economy. This is less than 1 percent of the total expenditures for hunting for Montana Department of Fish, Wildlife and Parks (MDFWP), Region Six, which includes Bitter Creek. These expenditures represent direct payments to sporting goods stores, motels, service stations and other services. As this \$7,650 is circulated, it generates about \$14,100 in gross business volume and about \$4,300 in salary and wages.

### County Employment and Earnings

Figures for 1976 and 1981 show agriculture, services and government to be the main sources of employment in Valley County (Table 3.8). Total employment decreased during this period with agricultural employment remaining relatively stable while manufacturing, services and government employment decreased substantially. Construction



**TABLE 3.8**  
**Valley County Employment and Earnings by Source for 1976 and 1981**

| Item  | Employment   |              |             | Personal Income <sup>1</sup><br>(\$1,000) |               |
|---|--------------|--------------|-------------|---|---------------|
|   | 1976         | 1981         | % Change    | 1976                                      | 1981          |
| Proprietors   |              |              |             |   |               |
| Farm  | 779          | 794          | 1.9         | 3,205                                     | 4,822         |
| Non-Farm  | 496          | 563          | 17.5        | 7,842                                     | 9,248         |
| Wage and Salary                                       |              |              |             |   |               |
| Farm  | 279          | 273          | -2.2        | 5,091                                     | 7,697         |
| Agricultural Services, Forestry,<br>Fisheries & other | 29           | (D)          | —           | 171                                       | (D)           |
| Mining  | 0            | (D)          | —           | 138                                       | (D)           |
| Construction <sup>2</sup>                             | 214          | 435          | 103.0       | 5,619                                     | 25,775        |
| Manufacturing   | 146          | 92           | -37.0       | 1,277                                     | 1,415         |
| Transportation and Public Utilities                   | 323          | 315          | -2.5        | 5,160                                     | 8,062         |
| Wholesale Trade                                       | 176          | 212          | 20.5        | 2,482                                     | 3,044         |
| Retail Trade  | 756          | 689          | -8.9        | 6,279                                     | 7,198         |
| Finance, Insurance, and Real Estate<br>Services       | 111          | 144          | 29.7        | 1,400                                     | 2,311         |
| Government  | 1,034        | 725          | -29.9       | 12,242                                    | 11,128        |
|   | 1,011        | 788          | -22.1       | 9,789                                     | 10,916        |
| <b>Total</b>  | <b>5,354</b> | <b>5,114</b> | <b>-4.5</b> | <b>49,648</b>                             | <b>78,388</b> |

(D) Not shown to avoid disclosure of confidential information. Data are included in totals.

<sup>1</sup> Wage and salary personal income includes proprietors income.

<sup>2</sup> Construction employment and personal income increased in 1981 with the Northern Border Pipeline project. This project has been completed.

Source: Bureau of Economic Analysis, U.S. Department of Commerce, Regional Economic Information System, 1983.

employment increased 292 percent from 1980 to 1981, with the Northern Border Pipeline project and has declined since then. From 1976 to 1981, the total employment in Montana increased by 12 percent.

Table 3.8 shows county earnings by source for 1976 and 1981. In 1976, services were the major source of earnings with government and agriculture contributing the next largest portions. In 1981, agriculture was the major source of earnings with services and government contributing the next largest portions (excludes construction earnings). Agricultural earnings varied during the time period from \$681,000 to \$14,188,000, while services and government earnings were relatively stable. During this same time period, total earnings in Montana increased by 17 percent (adjusted for inflation).

Although the WSA is considered to have high potential for the occurrence of natural gas (Tetra Tech, Inc., 1983), there are no natural gas fields in the WSA and reservoirs in the area can be expected to be of low pressure and low volume. Natural gas fields in Valley County produced 716,846 million cubic feet (MCF) and 615,049 MCF in 1980 and 1981 respectively. This production contributed less than 2 percent to the total property tax revenues for Valley County and schools. In 1980 and 1981, less than 20 people were employed in the mining sector, which includes oil and gas extraction. Exploration and development can provide a substantial number of jobs, however, producing fields offer little employment.

## WILDERNESS

### Wilderness Diversity (Ecotype/Landform)

The Bitter Creek WSA is in the Great Plains Shortgrass Prairie Ecoregion (3110) (subgroup grama/needlegrass/wheatgrass) according to the Bailey-Kuchler System (see Glossary). This is a broad based classification system that does not evaluate site specific vegetation types. Although Bitter Creek falls in the Shortgrass Prairie Ecoregion, it better fits the mixed-grass type classification. UL Bend, a 20,893-acre area managed by the U.S. Fish and Wildlife Service is presently the only representative of the short-grass prairie ecotype subgroup in the National Wilderness Preservation System (NWPS). Fifteen WSAs in the Charles M. Russell National Wildlife Refuge, totaling 161,480 acres, are also in the 057 subgroup. These study areas have been endorsed by the President and are awaiting Congressional action. Five BLM wilderness study areas, in this subgroup, have been preliminarily recommended suitable for wilderness and are being managed to preserve natural values. Appendix 3.6 lists all state and national representations of the 057 ecoregion subgroup.

If the 15 USFWS wilderness study areas were designated wilderness, the regional target for the 057 ecotype would be more than met. The addition of the BLM WSAs to the NWPS would not be necessary solely to balance ecotype diversity.

As part of the Roadless Area Review Evaluation II, the U.S. Forest Service (USFS) examined all wilderness and wilderness study areas in the United States for ecotype representation. They then assigned regional ecotype targets as a means of balancing ecotype diversity in the NWPS. The highest target would have at least six wilderness areas of a specific ecotype.

None of the USFS units were in subgroup 057, but they did identify one USFWS wilderness (UL Bend) and one USFWS wilderness study area in this ecotype. Actually, there are 14 additional USFWS WSAs in ecotype 057 not indicated by the Forest Service.

## Wilderness Opportunities: Proximity to Population Centers

There are no urban population centers within 5 hours driving time (250 miles) of Bitter Creek. The three closest urban areas are Billings and Great Falls, both about 6 hours from Bitter Creek and Bismarck/Mandan, North Dakota, about 8 hours away. Billings and Great Falls are "standard metropolitan statistical areas" (SMSAs), or industrial population concentrations defined by the U.S. Bureau of Census. Billings has a population of 66,798 and a county-wide population of 108,035 people according to the 1980 Census. Great Falls has 56,725 people, with a metropolitan area population of 80,696. Bismarck/Mandan, North Dakota, (which is not a SMSA) has 59,998 inhabitants, and a metropolitan area population of 79,988.

Billings and Great Falls are within 5 driving hours of abundant and diverse wilderness areas. There are 11 areas containing 4,559,142 acres within 250 miles of Billings and 18 areas totaling 8,673,567 acres within 250 miles of Great Falls. These two cities are also near a number of administratively-endorsed wilderness study areas and several other areas not administratively-endorsed but still undergoing study. Billings is within 250 miles of 54 administratively-endorsed wilderness study areas totaling about 3,446,800 acres and 107 other WSAs totaling 2,457,496 acres. There are 68 administratively-endorsed

study areas of 4,617,100 acres and 70 other WSAs totaling 1,720,578 acres within 250 miles of Great Falls.

The Bismarck/Mandan metropolitan area has access to far fewer wilderness areas. Bismarck is within 250 miles of seven designated wilderness areas of approximately 121,955 acres, two administratively-endorsed wilderness study areas totaling 24,400 acres and five other wilderness study areas of 72,508 acres.

## Regional Wilderness Analysis

Montana and North Dakota are combined into a region for purposes of this analysis. Visitors from this region have good access to northeastern Montana and are within reasonable driving distance of this study area. Portions of both of these states are within a 250-mile radius of the WSA. Residents of the states have similar economic and social backgrounds and presumably similar demands for wilderness resources.

In the region there are 19 wilderness areas of 3,471,064 acres, 51 units totaling about 1,872,452 acres of administratively-endorsed wilderness areas and 63 wilderness study areas (1,321,774 acres). Overall, the region has 6,665,290 acres in 133 areas either designated wilderness or with the potential of designation. Table 3.9 shows the distribution of designated and potential wilderness areas by state.

## Wilderness Quality Evaluation

Wilderness quality is one of the planning criteria considered before the selection of BLMs proposed action. Wilderness quality is evaluated by considering four items: apparent naturalness, outstanding opportunities for solitude, outstanding opportunities for primitive unconfined recreation and the presence of special features such as outstanding scenery, ecological, geological, educational or historic values. Evaluations of wilderness quality for each roadless segment of the Bitter Creek WSA follow.

TABLE 3.9  
Wilderness Regional Analysis Summary  
Approximate Acreage (Number of Areas)

| State   | BLM          | USFS           | NPS           | USFWS        | State Total    |
|---|--------------|----------------|---------------|--------------|----------------|
| Statutory Wilderness (State and Agency)           |              |                |               |              |                |
| Montana   | 6,000 (1)    | 3,360,342 (12) | N/A           | 64,997 (3)   | 3,431,339 (16) |
| North Dakota                                      |              |                | 29,920 (1)    | 9,805 (2)    | 39,725 (3)     |
| Total   |              |                |               |              | 3,471,064 (19) |
| Administratively Endorsed (State and Agency)      |              |                |               |              |                |
| Montana   | N/A          | 618,512 (33)   | 1,084,660 (2) | 161,480 (15) | 1,864,652 (50) |
| North Dakota                                      | N/A          | 7,800 (1)      | N/A           | N/A          | 7,800 (1)      |
| Total   |              |                |               |              | 1,872,452 (51) |
| Wilderness Further Study Areas (State and Agency) |              |                |               |              |                |
| Montana   | 442,202 (42) | 871,927 (20)   | 7,645 (1)     | N/A          | 1,321,774 (63) |
| North Dakota                                      | N/A          | N/A            | N/A           |              |                |
| Total   |              |                |               |              | 1,321,774 (63) |

Source: BLM, 1983

## Bitter Creek South SIZE

The southern segment consists of approximately 8,605 acres of public land. It forms the southern tip of the Bitter Creek WSA and is bounded by roads on the east, by roads and privately-owned lands on the south and west and by the Northern Border Pipeline and service road on the north.

## NATURALNESS

The segment as a whole appears natural. However, it does contain several man-made developments which create site specific impacts on naturalness. This segment contains 11 miles of fence, 8 reservoirs, a 2.25 mile vehicle trail and a stock corral (Table 3.10). The fence runs from the southwest corner of the subunit to the north and includes a fence segment which runs to the western border. It is a wood and steel-post, four-wire fence and creates little visual impact

beyond its immediate vicinity. The vehicle trail parallels the eastern edge of the segment and is used by hunters for access and by the livestock permittee to check his cows. Its overall adverse impact on naturalness is minimal. Two reservoirs and the corral are immediately adjacent to the boundary roads. Therefore, although they are apparent from the road, they are unnoticeable from most of the interior of the segment. The other reservoirs are well screened by their locations and small size.

The vegetation and landform appears natural and falls into one of three vegetation/landform types. The first type, the core area badlands, typified by sparse prairie grasses and forbs, also contains blowouts of exposed sand fringed on the south sides with creeping juniper. The second type includes the rims which border the segment on the south and east, predominantly vegetated by creeping juniper, buffaloberry and shrubs. Between the bordering roads and the rim is mixed grass prairie, which characterizes the third vegetation/landform type.

TABLE 3.10  
Manmade Features in Bitter Creek South

| Feature            | Legal Description  | Location                  | Approximate Length/area | Remarks  |
|--------------------|--|---------------------------|-------------------------|--|
| <b>Reservoir</b>   |  |                           |                         |  |
| 1                  | T. 33 N., R. 37 E., Sec. 27                              | Southwest Edge            |                         | Adjacent to boundary road  |
| 2                  | T. 33 N., R. 37 E., Sec. 23                              | Northwest Edge            |                         | Unvegetated berm located in shallow drainage, willows growing on dam |
| 3                  | T. 33 N., R. 37 E., Sec. 13                              | Northern Side             | 10 ac.                  | Larger reservoir   |
| 4                  | T. 33 N., R. 37 E., Sec. 13                              | Northern Side             | 3 ac.                   | Small, well-hidden reservoir   |
| 5                  | T. 33 N., R. 38 E., Sec. 19                              | Eastern Edge              |                         | Located next to corral along border road, obvious manmade structure  |
| 6                  | T. 33 N., R. 35 E., Sec. 31                              | Southeastern Edge         | 5 ac.                   | Dam is visible from boundary road at one point                       |
| 7                  | T. 33 N., R. 37 E., Sec. 26                              | Southwestern Side         |                         | Pit dam in bottom of drainage not evident                            |
| 8                  | T. 33 N., R. 37 E., Sec. 35                              | Southeast Corner          |                         | Pit dam — not evident  |
| <b>Vehicle Way</b> |  |                           |                         |  |
| 1                  | T. 33 N., R. 38 E., Secs. 17, 19, 30, 31                 | East Side                 | 4.25 miles              | Hunting access and permittee monitoring trail                        |
| <b>Fence</b>       |  |                           |                         |  |
| 1                  | T. 33 N., R. 38 E., Secs. 12, 13, 22, 23, 24, 26, 35     | Branches unit north-south | 8.5 miles               | Wood and steel post fence which splits unit. Little impact.          |
| 2                  | T. 33 N., R. 37 E., Sec. 24; T. 33 N., R. 38 E., Sec. 19 | Southeast                 | 2.5 miles               | Wood and steel post cross-fence in AMP #4071                         |
| <b>Corral</b>      |  |                           |                         |  |
| 1                  | T. 33 N., R. 38 E., Sec. 19                              | East Side                 | 1 ac.                   | Adjacent to road. Made of wood posts                                 |

TABLE 3.11  
Manmade Features in Bitter Creek West

| Feature             | Legal Description   | Location                | Approximate Length | Remarks  |
|---------------------|---|-------------------------|--------------------|--|
| <b>Reservoir</b>    |   |                         |                    |  |
| 1                   | T. 34 N., R. 37 E., Sec. 35   | Southeast Side          |                    | Small pit in drainage bottom; older, rocked dam.               |
| 2                   | T. 34 N., R. 37 E., Sec. 37   | Southeast Edge          |                    | Natural appearing small reservoir.                             |
| 3                   | T. 34 N., R. 37 E., Sec. 34   | West Side               |                    | Natural appearing revegetated dam.                             |
| 4                   | T. 34 N., R. 37 E., Sec. 26   | Center                  |                    | Small dam in bottom of small drainage.                         |
| 5                   | T. 34 N., R. 37 E., Sec. 24   | Eastern Edge            |                    | Well-hidden, small reservoir.                                  |
| 6                   | T. 34 N., R. 37 E., Sec. 13   | Northeastern side       |                    | Well-hidden, small reservoir.                                  |
| 7                   | T. 34 N., R. 37 E., Sec. 15   | Northern Side           |                    | Rectangular pit-type dam with low impact.                      |
| 8                   | T. 34 N., R. 37 E., Sec. 11   | Northern Edge           |                    | Natural appearing reservoir, visible from boundary road.       |
| 9                   | T. 34 N., R. 37 E., Sec. 11   | Northern Edge           |                    | Small reservoir located in drainage bottom.                    |
| 10                  | T. 34 N., R. 37 E., Sec. 14   | Northern Side           |                    | Natural contoured dam, site specific impact.                   |
| 11                  | T. 34 N., R. 37 E., Sec. 1  | Northeastern Edge       |                    | Small reservoir directly adjacent to boundary road.            |
| <b>Vehicle Ways</b> |   |                         |                    |  |
| 1                   | T. 34 N., R. 37 E., Secs. 25,26,35                                  | Center                  | 2 mi.              | Fence access trail.  |
| 2                   | T. 34 N., R. 37 E., Secs. 26,27,33,34,35                            | Center                  | 3.25 mi.           | Fence access trail.  |
| <b>Fence</b>        |   |                         |                    |  |
| 1.                  | T. 34 N., R. 37 E., Secs. 25,26,27<br>T. 33 N., R. 37 E., Secs. 3,4 | Center and western side | 7 mi.              | Wood and metal post fence in several inter-connected segments. |

25 reservoirs, 44 miles of fence, a developed spring with a 2-mile buried water pipeline plus 2 tanks, and 12.5 miles of unmaintained vehicle trail. The majority of these developments occur above T. 34 N. (Table 3.12).

The larger reservoirs which contain waterfowl nesting islands such as Flat Reservoir (T. 35 N., R. 38 E., Sec. 21), Jug Reservoir (T. 35 N., R. 38 E., Sec. 21), and Hardrock Reservoir (T. 34 N., R. 38 E., Sec. 4) show some signs of recent earthmoving but are revegetating and create little additional impact beyond the sight specific impact of the reservoirs themselves.

The spring development is hidden in a shrub coulee and is accessed by a grassy, little used vehicle trail. Unless directly adjacent to the spring, visitors would not be aware of its existence.

The fences are a mixture of wood and metal post designs which generally are not silhouetted against the sky and therefore tend to blend in with the overall scenery.

Vehicle trails traverse the northern and southern portions of the segment. These are simply compression tracks created by vehicle passage and are generally used so little

that grass and forbs cover them up. In autumn, hunter traffic makes these trails somewhat more visible. Their overall adverse influence on natural values is negligible.

Three vegetation/landform types are present in the segment. The first type, located between the eastern boundary road and the rims which overlook the segment, is mixed grass prairie. The rims themselves are characterized by quaking aspen and shrubs and comprise the second type. The core of the segment is a badlands type landscape, with open shale slopes, scattered grasses and some "blowout" areas on the north side. Overall it appears that natural processes are at work to produce and maintain the present landscape.

#### SOLITUDE

The eastern segment offers outstanding opportunities for solitude. It contains approximately 39,950 acres of public land, a state inholding amounting to 640 acres and 1,360 acres of private land for a total of 41,950 acres inside the boundaries. The segment includes portions of two major drainages, the South Fork of Bitter Creek and the East Fork of Willow Creek. Both drainages appear as broad

## SOLITUDE

This segment does not offer broad opportunities for outstanding solitude. It contains approximately 8,605 acres of public land and a state inholding of 640 acres for a total of 9,245 acres. The core-to-perimeter distance is approximately 1½ miles and it is 4½ miles across at the widest point.

The southern segment is an expansive bowl with one major drainage, Eagles Nest Coulee, and several side drainages radiating from the 200-foot higher rimlands to the east. There is a feeling of solitude inside the bowl but this is limited by both the absence of vegetative screening and by the lack of deep drainages to shelter one visiting party from another. The resulting openness means that inside this segment one visitor can see another up to 2 miles away.

## PRIMITIVE RECREATION

The segment does not offer outstanding opportunities for primitive recreation. The potential recreational activities include hunting, horseback riding, wildlife viewing, photography, camping and hiking. However, none of these would represent a challenging or exceptional recreational opportunity.

In wet conditions, the access roads would be impassable. Visitors in the area during soaking rainstorms would find foot travel extremely difficult. In winter, snow covers the lower sections but is blown off any windward areas and from exposed heights. This would make cross-country skiing and other winter activities very difficult. Summer temperatures are often over 100°F.

## SPECIAL FEATURES

The segment contains signs of early inhabitant's presence, including scattered tipi rings and lithic scatters.

The entire segment has an interesting geologic history. In late Pleistocene geologic times, a crack in the covering glacier ice, appeared through which melt-off water could flow. This crack in the ice was the reason for the advanced erosion which typifies this segment in contrast to the surrounding landform. The thin covering till rapidly eroded with the flow of melt water, exposing the Bearpaw shales to mass wasting and developing deep drainage channels.

The "blowout" areas in the center of the segment and bordering the pipeline crossing are a function of this geologic process. These were formed by a greater amount of glacial till being deposited on south facing slopes than on north slopes. A mixture of wind and water eroded the thin till and now erodes the underlying shales. Creeping juniper and forbs protected the resultant sand/shale "waves" from further encroachment, leaving the typical "blowout" scenery.

## Bitter Creek West

### SIZE

The western segment consists of approximately 11,105 acres of public land. It forms the western edge of the WSA and is bounded by roads on the north and east, on the west primarily by private lands and on the south by the Northern Border Pipeline Corridor.

## NATURALNESS

The segment as a whole appears natural. However, it does contain several man-made developments including 7 miles of fence, 5.25 miles of vehicle trail and 11 reservoirs that impact naturalness on a site specific basis (Table 3.11). The wood and metal four-wire fence splits the segment horizontally before joining the south west side of the segment. Any adverse visual impact is localized. The reservoirs are grouped to the north and south of the segment. All of the reservoirs are either well hidden, dry or appear to be naturally occurring prairie potholes. The major vehicle trail segments follow the fenceline. The vehicle trails are primitive and difficult to follow and create a minimal visual impact. The overall adverse influence of these range improvements is low.

## SOLITUDE

The segment does not offer broad based outstanding opportunities for solitude, other than in isolated pockets. The western section contains 11,105 acres of public land and one state inholding of 640 acres for a total of 11,745 acres. The core to perimeter minimum distance is 2 miles east-to-west and 3 miles north-to-south. The segment is 4 miles across at its widest point.

The western segment appears open and undulating. It is more deeply dissected on the western edge as the South Fork of Bitter Creek, which splits the segment horizontally, drops into Willow Creek. The lack of vegetative or topographic screening detracts from solitude values.

There are only minimal interior or exterior reminders of man's presence in the unit. However, any human activities inside or near the segment would detract from the solitude opportunities due to the lack of any screening.

## PRIMITIVE RECREATION

This segment does not offer outstanding opportunities for primitive and unconfined recreation. What opportunities there are for primitive recreation and challenges are the same as those described for Bitter Creek South.

## SPECIAL FEATURES

Evidence of early Indian campsites with firepits and lithic scatters exist in this segment.

The geologic history of this segment is the same as that described for Bitter Creek South.

## Bitter Creek East

### SIZE

The eastern segment consists of approximately 39,950 acres of public land. This portion is the core of the unit and is bounded by roads and private land to the east, west and north and by Northern Border Pipeline Corridor to the south.

## NATURALNESS

The segment as a whole appears natural. However, a number of range developments, in several areas, impair naturalness on a site specific basis. This segment contains



sparsely vegetated bowls 1/4 to 1/2 mile in width, and are separated by a low ridgeline in T. 34 N.

The feeling of solitude one gets in the main drainage bottoms is fragile at best because it comes from an absence of people, at that moment, rather than the topography. Vegetative screening is limited to small aspen groves on the "rims." However, the segments' sheer size permits a number of visitors to be present in the area at the same time without undue affect on solitude.

#### PRIMITIVE RECREATION

The segment does not offer outstanding opportunities for

primitive recreation. Recreational activities include hunting, horseback riding, wildlife photography, camping and hiking. Challenges and hazards are the same as those detailed for the Bitter Creek South.

#### SPECIAL FEATURES

Tipi rings and lithic scatters attest to early settlement of this portion of the WSA by Indians.

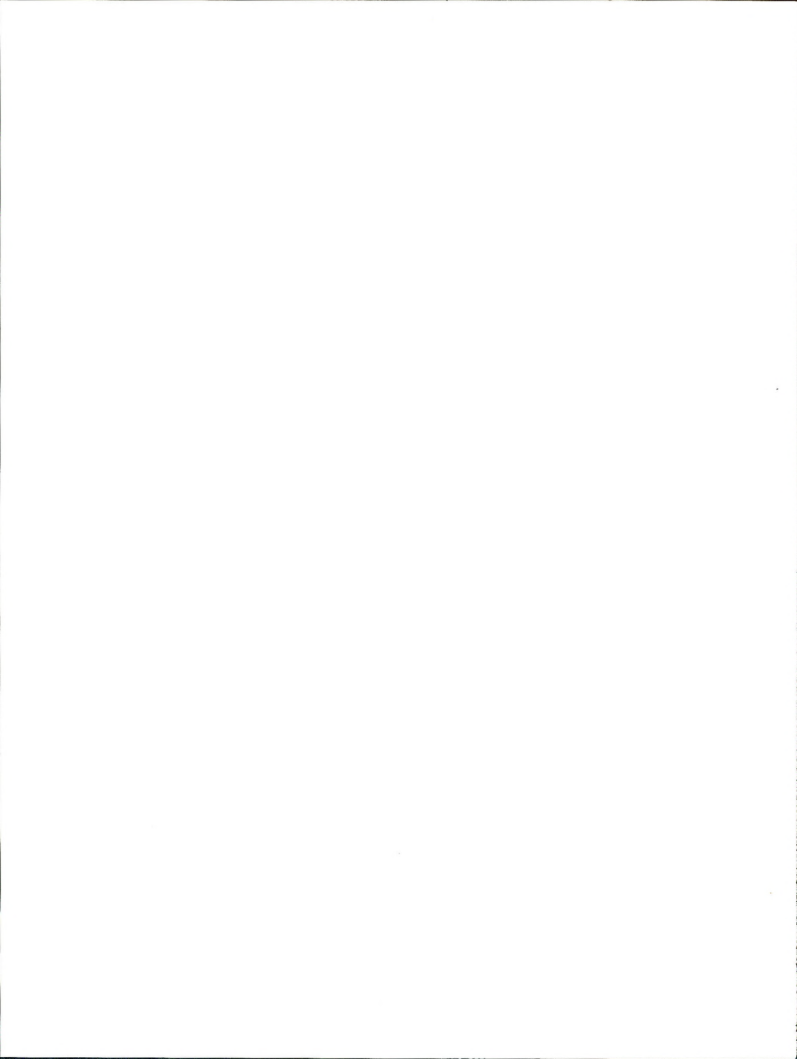
The geologic history of this segment of the WSA are the same as those described for the Bitter Creek South.

TABLE 3.12  
Manmade Features in Bitter Creek East

| Feature          | Legal Description           | Location          | Approximate Length | Remarks  |
|------------------|-----------------------------|-------------------|--------------------|--|
| <b>Reservoir</b> |                             |                   |                    |  |
| 1                | T. 33 N., R. 38 E., Sec. 4  | Southeastern Side |                    | Reservoir at head of drainage, re-vegetated  |
| 2                | T. 33 N., R. 37 E., Sec. 1  | Southwestern Side |                    | Located on bottom of side drainage   |
| 3                | T. 33 N., R. 37 E., Sec. 2  | Southwestern Edge |                    | Very noticeable large reservoir with fishery   |
| 4                | T. 34 N., R. 38 E., Sec. 32 | South Side        |                    | Low impact, small reservoir  |
| 5                | T. 34 N., R. 38 E., Sec. 7  | Northwestern Side |                    | Small, well-screened reservoir   |
| 6                | T. 34 N., R. 38 E., Sec. 8  | Northwestern Side |                    | Located in bottom of small drainage  |
| 7                | T. 34 N., R. 38 E., Sec. 5  | North Side        |                    | Dry, totally revegetated reservoir   |
| 8                | T. 34 N., R. 38 E., Sec. 4  | North Side        |                    | Larger reservoir with goose islands; very visible from ridgeline to the south            |
| 9                | T. 34 N., R. 38 E., Sec. 4  | North Side        |                    | Larger reservoir with goose islands; adversely impacted from ridgeline to the south      |
| 10               | T. 34 N., R. 38 E., Sec. 2  | North Side        |                    | Small, natural appearing reservoir   |
| 11               | T. 34 N., R. 38 E., Sec. 11 | North Side        |                    | Small, well-vegetated reservoir  |
| 12               | T. 34 N., R. 38 E., Sec. 1  | Northeastern Side |                    | Older, larger reservoir; well vegetated and has a rock dam                               |
| 13               | T. 34 N., R. 39 E., Sec. 6  | Northeastern Edge |                    | Pit-type reservoir; easily noticeable from boundary road                                 |
| 14               | T. 34 N., R. 39 E., Sec. 7  | Northeastern Side |                    | Fairly large reservoir visible from boundary road  |
| 15               | T. 34 N., R. 38 E., Sec. 12 | Northeastern Side |                    | Large earth dam which is visible from the boundary road                                  |
| 16               | T. 35 N., R. 37 E., Sec. 35 | Northwestern Edge |                    | Newly rebuilt under IMP stipulations, earth scar is presently obvious                    |
| 17               | T. 35 N., R. 37 E., Sec. 25 | Northwestern Edge |                    | Located in a minor drainage, very little impact  |
| 18               | T. 35 N., R. 38 E., Sec. 23 | Northeastern Edge |                    | Small pit dam containing goose island, located on flat, open portion of the WSA          |
| 19               | T. 35 N., R. 38 E., Sec. 22 | Northern Edge     |                    | Located at head of open drainage and contains goose islands                              |
| 20               | T. 35 N., R. 38 E., Sec. 21 | Northern Edge     |                    | Recently rebuilt small dam containing goose islands, located on flat, grassy plain       |
| 21               | T. 35 N., R. 38 E., Sec. 21 | Northern Edge     |                    | Recently repaired irregular reservoir containing goose islands, located in open drainage |

TABLE 3.12 (Continued)  
Manmade Features in Bitter Creek East

| Feature                      | Legal Description   | Location          | Approximate Length | Remarks  |
|------------------------------|---|-------------------|--------------------|--|
| <b>Reservoir (Continued)</b> |   |                   |                    |  |
| 22                           | T. 35 N., R. 38 E., Sec. 33   | Northern Side     |                    | Willows grow on the dam of this small reservoir  |
| 23                           | T. 35 N., R. 38 E., Sec. 31   | Northern Side     |                    | Recently repaired pit-type reservoir containing goose islands, located on flat prairie area      |
| 24                           | T. 35 N., R. 38 E., Sec. 30   | Northern Side     |                    | Small dam with only minor site-specific impact   |
| 25                           | T. 35 N., R. 38 E., Sec. 30   | Northern Edge     |                    | Located near the boundary road and visible from area accessed road. Revegetated                  |
| <b>Spring Developments</b>   |   |                   |                    |  |
| 1                            | T. 34 N., R. 38 E., Sec. 34   | Southeastern Edge |                    | Development hidden by aspen grove, serviced by grassy constructed trail                          |
| <b>Water Pipeline</b>        |   |                   |                    |  |
| 1                            | T. 34 N., R. 38 E., Secs. 21,27,28  | Eastern Side      | 2 miles            | Buried pipeline-water source is spring on private land. Has 2 tanks — one midway and one at end. |
| <b>Vehicle Ways</b>          |   |                   |                    |  |
| 1                            | T. 34 N., R. 38 E., Secs. 30,31,32  | Southern Edge     | 4.25 mi            | Old, well worn trail across bottom portion of WSA  |
| 2                            | T. 34 N., R. 38 E., Secs. 4,5,6   | Center of Unit    | 3.25 mi            | Branches in Sec. 6, both halves dead end   |
| 3                            | T. 34 N., R. 39 E., Secs. 5,6,7,12<br>T. 35 N., R. 39 E., Sec. 31                                   | Eastern Side      | 3 mi               | Minimal trail which accesses 3 reservoirs  |
| 4                            | T. 35 N., R. 38 E., Secs. 21,22,28,33   | Northern Side     | 2 mi               | On both PD and private land, accesses 3 reservoirs   |
| <b>Fences</b>                |   |                   |                    |  |
| 1                            | T. 34 N., R. 37 E., Secs. 1,2,3,4<br>T. 35 N., R. 38 E., Secs. 19, 20, 29, 30, 31, 32               | Northern Side     | 8 mi               | Metal post, 4-wire fence, minor impact   |
| 2                            | T. 35 N., R. 38 E., Secs. 32,33<br>T. 34 N., R. 38 E., Secs. 1, 2, 3<br>T. 35 N., R. 39 E., Sec. 31 | Northern Side     | 5.75 mi            | Metal post, 3-wire fence, minor impact   |
| 3                            | T. 35 N., R. 38 E., Secs. 23,27,28,29,32  | Northern Side     | 4 mi               | Wood and metal posts, 4-wire fence, minor impact   |
| 4                            | T. 34 N., R. 38 E., Secs. 13,14,15,16,17,18<br>T. 34 N., R. 39 E., Sec. 18                          | Center of Unit    | 7 mi               | Metal posts, 4-wire fence, low impact  |
| 5                            | T. 34 N., R. 38 E., Sec. 1<br>T. 34 N., R. 39 E., Sec. 36   | Eastern Edge      | 2.5 mi             | Metal posts, 4-wire fence, low impact  |
| 6                            | T. 33 N., R. 37 E., Secs. 1,12<br>T. 34 N., R. 38 E., Secs. 7, 18, 19, 30, 36                       | Western Edge      | 8.25 mi            | Wood and metal posts, 4-wire fence, minor impact   |
| 7                            | T. 33 N., R. 38 E., Secs. 4,7,8,9   | Southern Edge     | 3.5 mi             | Wood and metal posts, 4-wire fence, minor impact   |
| 8                            | T. 34 N., R. 37 E., Sec. 9  | Western Edge      | 1 mi               | Metal post, 4-wire fence, low impact   |
| 9                            | T. 35 N., R. 38 E., Secs. 4,8,17,18,19  | Eastern Edge      | 4 mi               | Metal posts, 4-wire fence, low impact  |





# CHAPTER 4

## ENVIRONMENTAL CONSEQUENCES

This chapter evaluates the environmental and socioeconomic impacts of implementing the actions associated with alternatives presented in Chapter 2. The impacts are analyzed under each alternative for the Bitter Creek WSA with the proposed action presented first, followed by the alternatives. These impacts are associated with recreation management, range management, wildlife management, and minerals development. Issues such as cultural resources, air quality, and soils would not be significantly impacted by the alternatives. Cultural surveys already completed indicate low density of sites and no anticipated National Register sites.

The economic impact analysis is primarily associated with the ranch operations having grazing permits in Bitter Creek. The analysis follows the procedure identified by Leroy Luft, Agriculture Management and Economic Consulting (AMEC), (1982). The impacts identified include restrictions on vehicle use to check cows and repair range improvements, restrictions on range developments and the effect on ranch loan and sale values. The possible additional dollar costs to the operators as a result of vehicle way closures would vary widely depending on use normally made of ways and the number of operators involved. Appendix 4.1 describes the methodology used to access ranch related economic impacts. None of the alternatives would affect grazing or other resources enough to significantly impact county employment or earnings.

### IMPACT ANALYSIS BY ALTERNATIVE

#### Proposed Action (No Wilderness)

Under the proposed action the entire 59,660 acre Bitter Creek WSA would be recommended as nonsuitable for wilderness designation.

#### Impacts on Wilderness Values

##### NATURALNESS

The Bitter Creek WSA appears natural. The developments are scattered throughout the WSA and are generally screened by the topography. A moderate level of range improvement (RI) activities is anticipated during the first five years. Chiseling has been proposed on 22 different sites for a total of 2,310 acres as well as construction of 3 new reservoirs which would disturb a total of 6 acres. This would cause a non-natural appearance on approximately 5 percent of the WSA.

Approximately 11 percent (7500 acres) of the WSA is presently leased (post-FLPMA) for natural gas development. With this alternative the entire WSA (59,660 acres) would be available for leasing for natural gas. There is a possibility of 75 wells being drilled in the WSA with each well site

disturbing about an acre of land which would impair wilderness natural values. The success ratio for a producer is 1 out of 10, which would result in 8 developed wells (10 percent). This would involve 50 miles of roads, 30 miles of gathering lines, and a 50-mile trunk line. There would be direct surface disturbing activities on approximately 775 acres which would eliminate the natural appearance from an estimated 15 percent of the WSA.

The wildlife habitat improvement program includes the construction of 20 nesting islands and 4 reservoir fencing projects. The cumulative impacts of these activities would reduce the naturalness of the WSA by 5 percent and would be obvious to the visitor.

##### SOLITUDE

Only the eastern segment of the WSA (41,950 acres) offers outstanding opportunities for solitude. The mineral activities associated with the natural gas development would adversely impact the wilderness value of solitude.

An estimated 2,000 acres (3.5 percent) in the WSA would be impacted from the use of new vehicle ways associated with hunting and off-road vehicles in the unit. The total recreational use would be expected to increase from 600 to 660 visits annually.

##### PRIMITIVE AND UNCONFINED RECREATION

The area is not rated as having outstanding opportunities for primitive and unconfined recreation and actual use levels are low. The natural gas development, the associated roads and pipelines, and the periodic human activity would decrease the quality of primitive recreation opportunities throughout the entire 59,660 acre WSA but because primitive non-motorized use is so low, no reduction in use is projected.

**Conclusion:** The naturalness of the WSA would be reduced by 25 percent as a result of the chiseling projects, construction of reservoirs, nesting islands, fences and natural gas development. The opportunities for solitude would be reduced on approximately 10 percent of the WSA during the two months that each well is being drilled. Although the unit does not have outstanding opportunities for primitive or unconfined recreation, the activities proposed for the WSA would impact the quality of the visitor's experience, but there is no projected reduction in the already low use levels.

#### Impacts on Recreation Access for the Elderly/Disabled

This alternative would accommodate the largest number of elderly/disabled visitors to the area since all of the 59,660 acres and six existing vehicle ways totaling 19.5 miles, would remain open to motorized public access. Under current MFP guidance, ORV access is the foundation for most

recreational activities in the area, and would allow for the increase in level of use by this group of users by 20 percent. Most of the use occurs within 1/4 mile of the existing roads and vehicle ways.

**Conclusion:** There would be an increase in recreational use associated with access for either the elderly or disabled from 5 to 7 visits (20 percent) over the next 5-10 years.

### Impacts on Recreational Access/Use Levels

This alternative would not decrease the motorized public access or the related level of recreational activity. There could be a 9 percent increase in such activities in the next 5-10 years.

**Conclusion:** There would be no reduction in motorized access. Recreational use would increase from 600 to 650 visits per year.

### Impacts on Range Improvement Projects

The proposed range improvements described in Table 3.2 would proceed as funding and planning allow. Vegetative production could increase by as much as 373 animal unit months on the 2,310 acres proposed for chiseling. Other proposed range improvements include 3 new reservoirs enclosed by 1/4 mile fence each, which would improve livestock distribution and decrease the overutilization of some areas where water is presently unavailable.

**Conclusion:** There would be no impact on the construction of the 3 reservoirs or completion of chiseling on 22 sites for 2,310 acres. There would not be any impact to existing range improvement maintenance levels.

### Impacts on Amount of Noxious Plant Acreage

Noxious plants would continue to be treated chemically, biologically, by fire, or mechanically by grubbing. This would result in maximum control of these infestations.

**Conclusion:** There would be no impact on the control of noxious plants and the continued treatment would maintain the amount of noxious plant acreage at 2 acres.

### Impacts on Mule Deer Populations

Mule deer population ranges from 8 to 10 per square mile. Mule deer harvests could be applied uniformly to the area since unrestricted motorized access would allow hunters to reach the interior of the WSA.

**Conclusion:** This alternative would not result in a significant change in mule deer populations. There would be no change in the success of reaching harvest quotas and managing big game populations at existing levels. As mule deer are highly adaptable, the increased activity will not negatively impact the overall herd size.

### Impacts on Coyote Populations

Since unrestricted motorized access would allow predator hunting throughout the area, coyote populations would be affected according to the level of hunting pressure. A 5 percent increase in ORV use is anticipated during hunting seasons.

**Conclusion:** Coyote populations could decrease slightly if additional hunting success is associated with increased ORV use.

### Impacts on Natural Gas Development

Seventy-five gas wells would be drilled on the 59,660 acres in the WSA with possibility of having eight producers.

**Conclusion:** There would be no impact on natural gas development levels.

### Impacts on Development of Other Minerals

The exploration and development of sand, gravel, or bentonite pits would be allowed. There would be an increased demand for sand and gravel for use on the road systems associated with the 8 producer wells.

**Conclusion:** There would be no impact on the development of these other minerals.

### Economic Impacts

There would be no quantifiable ranch, recreational or wildlife related economic benefits foregone with the proposed action. Up to \$6,700 of livestock sales (see Glossary) income could be generated by additional AUMs from range improvements. However, vicarious values or knowing that the wilderness area exists and the value of the wilderness experience would be foregone.

**Conclusion:** The additional 373 AUMs could generate up to \$6900 in livestock sales.

### Irreversible-Irretrievable Commitment of Resources

The non-designation as wilderness could create an irretrievable or irreversible commitment for some wilderness values within the Bitter Creek WSA. There would be the loss of naturalness and the opportunities for solitude. The modification of vegetation, the disruption of wildlife, and the impact to scenic quality and primitive recreation, hunting, and wildlife habitat would conflict at times with enhancement of long term productivity of other natural gas development.

### All Wilderness Alternative

Under the All Wilderness Alternative, the entire 59,660 acre Bitter Creek WSA would be recommended as suitable for wilderness designation. There would be no natural gas development or recreational ORV use within the WSA.

### Impacts on Wilderness Values

#### NATURALNESS

The Bitter Creek WSA appears natural. Wilderness designation will ensure preservation of the natural character of the area. The developments are dispersed throughout the WSA and are generally screened by the topography. The proposed chiseling project would be dropped but the construction of 3 replacement reservoirs would continue and would disturb about 6 acres. Diminished use of motorized vehicles for maintenance of range improvement projects

over a 10-year span would enhance natural values. As there are 44 reservoirs, 61.9 miles of fence, 1 spring, 2 miles of buried pipeline with two stock tanks, and 1 corral, all of which would require maintenance or replacement, the wilderness values would be impaired from time to time on 10 percent of the WSA.

The twenty (20) waterfowl nesting islands would be constructed on three reservoirs. In addition 100 feet wide areas of riparian vegetation around the four reservoirs would be fenced. These actions would diminish the natural appearance on about 20 acres in the WSA but would benefit positively the wilderness values by increasing waterfowl habitat and riparian vegetation around the reservoirs.

#### **SOLITUDE**

Wilderness designation will preserve the existing outstanding solitude in the portion of the WSA that now contains those values (941,950 acres). The vehicle traffic on the three internal roads that separate the WSA into 3 segments (East, South, and West) [see General Setting Map], and their visibility from surrounding areas ensures continued impacts on solitude values for approximately 2,000 acres along 14 miles of these roads or about 20 percent of the WSA.

#### **PRIMITIVE OR UNCONFINED RECREATION**

The WSA does not have outstanding opportunities for primitive or unconfined recreation. Recreational opportunities including mule deer and predator hunting, hiking, and camping would continue to be available but increased non-motorized recreational use is not projected.

**Conclusion:** The wilderness values of naturalness and opportunities for solitude would be enhanced on most of the WSA. The continuation of primitive recreational opportunities such as hiking, camping and hunting in isolated natural settings would remain. Wilderness designation would preserve the WSAs special features such as the scenic attributes and the aspen groves on the rim of the WSA and would protect the area's wildlife habitat.

#### **Impacts on Recreation Access for the Elderly/Disabled**

Wilderness designation would close 59,660 acres and six vehicle ways totaling 19.5 miles to motorized travel. Because of their total dependency on vehicles, an estimated five elderly and/or disabled people would be precluded from visiting the interior of the WSA yearly. Most use occurs within 1/4 mile of the roads or vehicle ways. The remaining portions of the WSA does not receive use by the elderly/disabled visitor.

**Conclusion:** This alternative would preclude use by an estimated five elderly and/or disabled visitors yearly.

#### **Impacts on Recreational Access/Use Levels**

This motorized access closure would reduce the number of hunters, fishermen, and sightseers from 595 visits to 325 visits.

**Conclusion:** Declining recreational access levels would result in a 56 percent reduction in hunter visits to this area and a 14 percent decrease in other recreational activity levels.

#### **Impacts on Range Improvement Projects**

Bitter Creek WSA has 3 reservoirs proposed within the Upper Canyon Creek allotment, which is in an area of about 2,000 acres that has high natural values. The need for those range improvements is to draw livestock into an underutilized area and relieve some of the pressure on the rest of the allotment in the unit (Figure 3.1). The underutilized area is receiving light use (21-40 percent). It is estimated that with the proposed water development, utilization levels should increase 10 percent to a moderate category. A possible 373 animal unit month increase would be foregone by restricting chiseling on approximately 2,310 acres of clubmoss/blue grama sod-bound rangeland in fair or lower range condition.

**Conclusion:** Wilderness designation would have a moderate to high impact to range management, mostly due to the restriction on range developments. New range improvements could not be allowed solely to increase livestock numbers. The three reservoirs would be reconstructed. The chiseling project would not be accomplished. Maintenance would continue on the range improvement projects but would be done primarily on foot or horseback using hand tools.

#### **Impacts on Amount of Noxious Plant Acreage**

Noxious plants would be controlled as they become a threat to lands adjacent to the WSA or begin to spread within the study area. Without controls, infestations are expected to increase 1/4 acre per year.

**Conclusion:** Noxious plants would be controlled as they become a threat to lands adjacent to the WSA or begin to spread within the study area.

#### **Impacts on Mule Deer Populations**

The dominant big game species is mule deer. This population ranges from 8 to 10 deer per square mile. The closure of 19.5 miles of vehicle ways would reduce deer harvest in the WSA, specially the core area. Local hunters traditionally drive the entire WSA, both on and off vehicle ways, and are accustomed to harvesting their deer in this fashion. It can be assumed that with this alternative, game management harvest goals would be reached only around the perimeter of the WSA. With very few exceptions, only trophy animal harvest could be expected within the interior of the WSA. There would be essentially no antlerless deer harvest within the core area. Big game populations could increase up to 25 percent, to approximately 10 to 12.5 deer per square mile. This area already supports one of the Valley Resource Area's highest deer densities and carrying capacity problems could occur in the future.

**Conclusion:** Mule deer populations could increase up to 25 percent, causing some reduction of herd quality.

#### **Impacts on Coyote Populations**

This alternative would halt the use of motorized vehicles and aircraft for hunting coyotes which could result in a slight increase in the coyote population.

**Conclusion:** No significant increase in coyote numbers would be expected from this alternative alone.

## Impacts on Natural Gas Development

Seventy-five gas wells of which 8 are estimated to be producers (10 percent success ratio) are projected to be drilled. These wells would not be completed so as to maintain the wilderness values of the Bitter Creek WSA. The potential for the occurrence of natural gas is rated high.

**Conclusion:** The opportunity to drill 75 natural gas wells would be foregone. Also up to 8 production wells with an undetermined volume of natural gas would be foregone.

## Impacts on Development of Other Minerals

Wilderness designation would preclude exploration for or development of other minerals (bentonite, sand and gravel) in the WSA. There would be no impacts because there would be no demand for sand and gravel if the natural gas wells are not drilled.

**Conclusion:** Although this alternative would not allow exploration for or development of other minerals in the WSA, the impact would be insignificant because of the low probability of other mineral occurrence.

## Ranch Related Economic Impacts

The substitution of horses for casual vehicle use would result in increased expenses of approximately \$530 and about 640 additional hours of labor annually. The potential loss in loan value could be as much as \$659,000 (see Appendix 4.2). Six operators have BLM permits to graze within the WSA. These impacts would be split among the various operators. Restrictions on range improvements, such as water development could impact livestock distribution and inhibit attempts to increase conception rates and subsequently livestock sales.

With restrictions on range improvements a possible 373 animal unit month increase in livestock forage would be foregone, thus preventing livestock sales from increasing by an estimated \$6,900. The loss of potential livestock sales would be less than 1 percent of Valley County's total livestock sales for 1982.

**Conclusion:** Wilderness designation could result in increased ranch maintenance expenses of \$530 and up to 640 additional hours of labor annually. The livestock sales associated with the additional 373 AUMs of forage could increase annually by an estimated \$6900.

## Recreation/Wildlife Related Economic Impacts

With restrictions on motor vehicle use, there would be a decrease of 250 hunter days annually. This would decrease hunting expenditures by an estimated \$4,250 annually for the regional economy which is less than 1 percent of the total expenditure for hunting in Montana Department of Fish, Wildlife and Park's (MDFWP) Region Six. This decrease would be partially offset by a temporary increase in non-hunting use and expenditures of approximately \$600. Decreased spending would impact local businesses that serve recreationists, however, the Glasgow area regional economy would not be significantly affected.

**Conclusion:** Hunting expenditures could decrease annually by an estimated \$4,250.

## Bitter Creek East Alternative

Under this alternative 39,950 acres of the Bitter Creek WSA would be recommended suitable for wilderness designation. There would be no natural gas development or recreational ORV use within this portion of the WSA. The remaining 19,710 acres would be recommended unsuitable.

## Impacts on Wilderness Values

### NATURALNESS

The eastern roadless area appears natural. This alternative would ensure the maintenance of the natural values on 39,950 acres in the WSA. The developments are dispersed throughout the suitable segment and generally screened by the topography. Required maintenance would be done on 25 reservoirs, 44 miles of fence, 1 spring development, and a 2-mile buried water pipeline with 2 tanks. The natural wilderness values would be impaired from time to time on 10 percent of the WSA.

The thirteen waterfowl nesting islands would be constructed on two reservoirs. In addition a 100 foot wide area of riparian vegetation around the three reservoirs would be fenced. These actions would diminish the natural appearance on about 12 acres in the WSA, but it would benefit positively the wilderness values by increasing waterfowl habitat and riparian vegetation around the reservoirs.

The 19,710 acres not designated as wilderness would be open to the following activities: ORV use, the development of 25 gas wells, and the construction of 7 waterfowl nesting islands, the construction of three reservoirs, and a 1310 acre chiseling project on 11 sites. Naturalness would be lost or reduced on the entire 19,710 acre area (about 30 percent of the WSA).

### SOLITUDE

This alternative will preserve the existing outstanding solitude values on 39,950 acres. The Bitter Creek East segment includes the irregular and undistinguishable northern boundary. The impacts to solitude values would be expected from unintentional trespass by ORV vehicles especially during hunting season and would affect about 8 percent of the WSA.

The internal roads discussed under the All Wilderness Alternative now become the boundary roads for this segment and would impact these values to a lesser degree (5 percent).

### PRIMITIVE AND UNCONFINED RECREATION

While primitive and unconfined recreation are not considered outstanding, the activity and noise associated with gas well development (3 producers) and ORV use would diminish the quality of primitive recreational experiences in the vicinity of the vehicle ways and developments.

**Conclusion:** On the 39,950 acres that are recommended suitable for wilderness designation, the naturalness and opportunities for solitude would be preserved and the scenic and recreational values would be maintained.

These values would be reduced by 30 percent on the 19,710 acre non-suitable segment.



### **Impacts on Recreation Access for the Elderly/Disabled**

This alternative would close 39,950 acres and four vehicle ways totaling 12.5 miles to motorized travel. Visits by the elderly and/or disabled would be reduced by 60 percent. Most of the use occurs within 1/4 mile of the roads and vehicle ways. The off road portions of the WSA do not receive use by the elderly and disabled visitor.

There would be no impacts to recreation access for the elderly/disabled on the remaining 19,710 acres in the Bitter Creek WSA.

**Conclusion:** This alternative would result in a 60 percent decrease in visits by the elderly/disabled populace.

### **Impacts on Recreational Access/Use Levels**

This motorized access closure would reduce the number of hunters, fishermen, and sightseers from 595 visits to 350 visits.

There would be no impacts to recreation access levels on the remaining 19,710 acres in this WSA.

**Conclusion:** The declining recreational access levels would result in a 50 percent reduction in hunter visits, and a 14 percent decrease in non-hunter visits.

### **Impacts on Range Improvement Projects**

A possible increase of approximately 168 AUMs would be foregone by restricting mechanical treatment (chiseling) on approximately 1,000 acres at 11 different sites in this segment. No other range improvement projects are proposed.

The proposed range improvements in the remaining 19,710 acres (3 new reservoirs and chiseling on 1,310 acres) would be constructed and maintained as funds become available. Vegetative production could increase by as much as 205 AUMs from the chiseling project.

**Conclusion:** The Bitter Creek East Alternative would have a low to moderate impact on range management. The chiseling project on 1,000 acres would not be accomplished. Maintenance would continue on the existing range improvement projects, but would be done primarily on foot or horseback using hand tools in the suitable segment.

There would be no impact on the construction of 3 reservoirs and completion of chiseling on 11 sites (1,310 acres) in the nonsuitable portion of the WSA.

### **Impacts on Amount of Noxious Plant Acreage**

Noxious plants on this 39,950 acre suitable segment would be treated as they become a threat to adjacent lands or begin to spread within this segment. Without treatment, infestations are expected to increase 1/4 acre per year. The methods of control would be limited to grubbing with hand tools and to chemical applications. Currently, there are no infestations under treatment in the suitable segment.

Noxious plants in the non-suitable segment would be controlled as discussed in the No Wilderness Alternative.

**Conclusion:** There would be no impact on the amount of noxious plants in the 19,710 acre segment and continued treatment would maintain the infestation at 2 acres.

### **Impacts on Mule Deer Populations**

This partial wilderness alternative would have essentially the same impacts on mule deer as the All Wilderness Alternative, except on less acreage. The closure of 12.5 miles of vehicle access would reduce the mule deer harvest.

Hunter success on the 19,710 acre segment would not be limited by ORV restrictions. Even with the new access roads associated with natural gas development, the hunting use levels and therefore harvest of mule deer are not projected to increase significantly in this segment.

**Conclusion:** Mule deer populations could increase up to 25 percent in this 39,950 acre segment, causing some reduction of herd quality.

There would be no impact to mule deer populations on the remaining 19,710 acres in this WSA.

### **Impacts on Coyote Populations**

There would be no significant change in coyote populations.

### **Impacts on Natural Gas Development**

Fifty gas wells are projected for exploration work with the possibility of having five production wells on line (10 percent success ratio). These wells would not be drilled so as to maintain the wilderness values on this 39,950-acre suitable segment of the WSA. The potential for the occurrence of natural gas is rated high.

Twenty-five gas wells would be drilled with possibility of having 3 producers on the remaining 19,970 acres.

**Conclusion:** The opportunity to drill 50 natural gas wells would be foregone on the 39,950 acres. Up to five producing wells with an undetermined volume of natural gas would be foregone. There would be no impact on natural gas development on the 19,970 acres.

### **Impacts on Development of Other Minerals**

No exploration for or development of other minerals (ben-tonite, sand and gravel) would be allowed on this 39,950 acre segment.

There would be an increased demand for sand and gravel for use on the road systems associated with the three producer wells. The exploration and development of these sale materials would be permissible on the remaining 19,710 acres.

**Conclusion:** Wilderness designation could preclude further exploration and development on 39,950 acres but the impact would be insignificant because of low probability for this type mineral occurrence. There would be no impact to the minerals industry on the remaining 19,710 acres in the WSA.

### **Ranch Related Economic Impacts**

The substitution of horses for casual vehicle use would result in increased expenses of approximately \$450 and about 460 additional hours of labor annually. The potential loss in loan value could be as much as \$421,000 (see Appendix 4.2). Six operators have BLM permits to graze within this segment. These impacts would be split among the

various operators. Restrictions on range improvements, such as water development could affect livestock distribution and inhibit attempts to increase conception rates and subsequently livestock sales.

A possible increase of 168 AUMs would be foregone with this alternative, thus preventing livestock sales from increasing by an estimated \$3,100. The loss of potential livestock sales would be less than 1 percent of Valley County's total livestock sales for 1982.

**Conclusion:** Wilderness designation could result in increased ranch maintenance expenses of \$450 and up to 460 additional hours of labor annually. Livestock sales could decrease yearly by an estimated \$3100.

### **Recreation/Wildlife Related Economic Impacts**

With restrictions on motor vehicle use there would be a decrease of 225 hunter days annually. This would decrease hunting expenditures by an estimated \$3,825 annually for the regional economy which is less than 1 percent of the total expenditures on hunting for MDFWP Region Six. Decreased spending would impact local businesses that serve recreationists, however, the Glasgow area regional economy would not be significantly affected.

**Conclusion:** Hunting expenditures could decrease annually by an estimated \$3,825.

### **Enhanced Wilderness Alternative**

Under this alternative 26,000 acres of the Bitter Creek WSA would be recommended suitable for wilderness designation. There would be no natural gas development or recreational ORV use within the WSA. The remaining 33,660 acres would be recommended non-suitable.

### **Impacts on Wilderness Values**

#### **NATURALNESS**

A core unit of 26,000 acres appears natural. This alternative will ensure the maintenance of existing natural values on this acreage. The developments are dispersed and generally screened by the topography. Required maintenance would be done on the 15 reservoirs, 25 miles of fence, 1 spring development, and 2 miles of buried water pipeline for range use. The maintenance would impair the naturalness values in the 26,000 acre segment from time to time on 8 percent of the WSA.

The nine (9) waterfowl nesting islands would be constructed on one reservoir. In addition a 100 foot wide area of riparian vegetation around the reservoir would be fenced. These actions would diminish the natural appearance on about 10 acres in the WSA but would benefit positively the wilderness values by increasing waterfowl habitat and riparian vegetation around the reservoir. This would impact 5 percent of the natural values.

The remaining 33,660 acres would have natural values lost or reduced from the construction of three reservoirs, exploration of 35 gas wells, chiseling on 2310 acres at 22 different sites, and the construction of 11 waterfowl nesting islands.

#### **SOLITUDE**

This suitable portion of the WSA includes 12 miles of vehicle ways which would be closed to recreational ORV use.

The internal road system discussed under All Wilderness Alternative becomes a part of suitable segment boundary. This would improve the area's opportunities for solitude wilderness values on 30 percent of the WSA.

The 33,660 acres recommended as non-suitable for wilderness would be open to ORV use, construction of 3 reservoirs, exploration of 35 gas wells, and chiseling on 2,310 acres. This would create a moderate impact on the wilderness values.

### **PRIMITIVE AND UNCONFINED RECREATION**

The WSA does not offer outstanding opportunities for primitive and unconfined recreation. Therefore no impact is anticipated. While these values are not rated as outstanding, the natural gas development, associated roads and pipelines, and periodic human activity would decrease the quality of primitive recreation experience through the entire 59,660 acre WSA.

**Conclusion:** On the 26,000 acres recommended suitable for wilderness designation, the size, naturalness, and solitude values would be improved slightly. The special features - scenic and cultural values - would be maintained. On the 33,660 acre non-suitable segment, these values would be impaired resulting in a moderate impact.

### **Impacts on Recreation Access for the Elderly/Disabled**

This alternative would close 26,000 acres and four vehicle ways totalling 12.5 miles to motorized travel. Visits by the elderly and/or disabled would be reduced by 40 percent. Most of this use occurs within 1/4 mile of the roads and vehicle ways. The off road portions of the WSA do not receive use by the elderly and disabled visitor.

There would be no impacts to recreational access for the elderly/disabled on the remaining 33,660 acres.

**Conclusion:** This alternative would result in a 40 percent reduction in visits by the elderly and/or disabled.

### **Impacts on Recreational Access/Use Levels**

This motorized access closure would reduce the number of hunters, fishermen, and sightseers from 595 visits to 425 visits.

**Conclusion:** The declining recreational access levels would result in a 40 percent reduction in hunter visits to this area, and a 14 percent long-term decrease in non-hunter visits.

### **Impacts on Range Improvement Projects**

No range improvement projects are proposed on the 26,000 acre suitable segment.

The proposed range improvements on the remaining 33,660 acres (3 reservoirs and chiseling on 2,310 acres) would be constructed and maintained as funds become available. Vegetative production would increase by as much as 373 AUMs from the chiseling project.

**Conclusion:** The Enhanced Wilderness Management Alternative would have less impact than the All Wilderness or Bitter Creek East Alternatives. The maintenance

would continue on the existing range improvement projects but would be accomplished primarily on foot or horseback using hand tools on the 26,000-acre segment.

There would be no impact on the construction of 3 reservoirs and the completion of 22 chiseling sites (2,310 acres).

### **Impacts on Amount of Noxious Plant Acreage**

Noxious plants on this 26,000 acre suitable segment would be treated as they become a threat to adjacent lands or begin to spread within this segment. The methods of control would be limited to grubbing with handtools or to chemical applications. Without treatment, growth would be 1/4 acre per year. Currently, there are no infestations under treatment in this segment.

Noxious plants in the non-suitable segment would be treated as discussed in the No Wilderness Alternative.

*Conclusion:* There would be no impact on the amount of noxious plants in the 33,660 acre nonsuitable segment and continued treatment would maintain the existing infestations at 2 acres.

### **Impacts on Mule Deer Populations**

The dominant big game species is mule deer. This population ranges from 8 to 10 deer per square mile in the WSA. This partial wilderness alternative would have essentially the same impacts on mule deer populations as the All Wilderness Alternative, except on less acreage. The closure of 12.5 miles of vehicle way would reduce the deer harvest in the area.

Hunter success on the 33,660 acre segment would not be limited by ORV restrictions. Even with the new access roads associated with the natural gas development activities, the hunting use levels and therefore the harvest of mule deer is not projected to increase significantly.

*Conclusion:* Mule deer populations could increase up to 25 percent in this 26,000 acre segment, causing some reduction of herd quality. There would be no impact to mule deer populations on the remaining 33,660 acres in the WSA.

### **Impacts of Coyote Populations**

There would be no significant change in coyote populations.

### **Impacts on Natural Gas Development**

Forty natural gas wells are projected for exploration with the possibility of having four producers on line. These wells would not be drilled so as to maintain the wilderness values on the 26,000 acres. The potential for the occurrence of natural gas is rated high.

Thirty-five gas wells would be drilled with possibility of having 4 producers on the remaining 33,660 acres.

*Conclusion:* The opportunity to drill 40 natural gas wells would be foregone on the 26,000 acres. Up to four producing wells with an undetermined volume of natural gas would be foregone.

There would be no impact on natural gas development (35 wells) on the 33,660 acres.

### **Impacts on Development of Other Minerals**

No exploration for or development of other minerals (ben-tonite, sand and gravel) would be allowed on this 26,000-acre segment. There would be an increased demand for sand and gravel for use on the road systems associated with the four producer wells. The exploration and development of these sale materials would be permissible on the remaining 33,660 acres.

*Conclusion:* Wilderness designation could preclude further exploration and development on 26,000 acres. The impact would be insignificant with the low probability projected in the GEM Report for this type of mineral occurrence. There would be no impact to the minerals industry on the remaining 33,660 acres in the WSA.

### **Ranch Related Economic Impacts**

The substitution of horses for casual vehicle use would result in increased expenses of approximately \$360 and about 260 additional hours of labor annually. The potential loss in loan value could be as much as \$269,000 (see Appendix 4.2). Five operators have BLM permits to graze on the lands in this segment. These impacts would be split among the various operators. Restrictions on range improvements, such as water development (Table 3.2), could affect livestock distribution and inhibit attempts to increase conception rates and subsequently livestock sales.

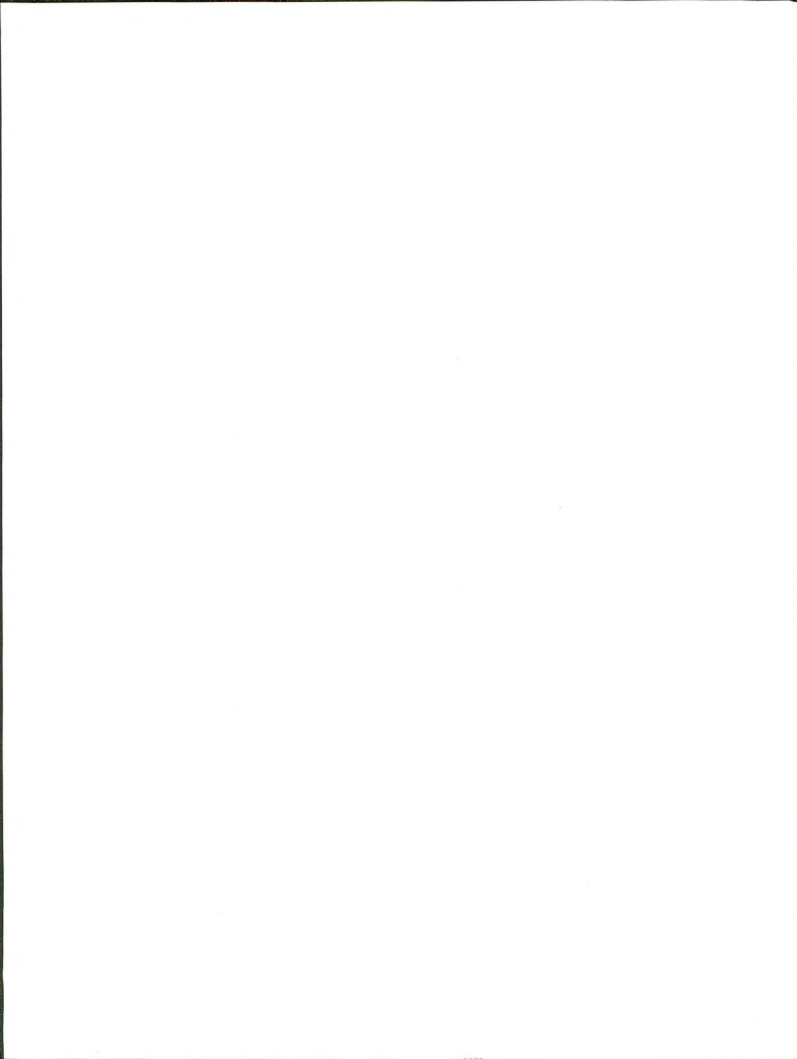
*Conclusion:* Wilderness designation could result in increased ranch maintenance expenses of \$360 and up to 260 additional hours of labor annually. Livestock sales associated with the 373 AUMs could increase yearly by \$6900.

### **Recreation/Wildlife Related Economic Impacts**

With restrictions on motor vehicle use there would be a decrease of 150 hunter days annually. This would decrease hunting expenditures by an estimated \$2,550 annually for the regional economy which is less than 1 percent of the total expenditures on hunting for MDFWP Region Six. Decreased spending would impact the local businesses that serve recreationists, however, the Glasgow area regional economy would not be significantly affected.

*Conclusion:* Hunting expenditures could decrease annually by an estimated \$2,550.





## CHAPTER 5

# CONSULTATION AND COORDINATION

### SCOPING FOR THE BITTER CREEK WILDERNESS STUDY/EIS

The long history of input from private individuals, organizations and local, county and state governments was considered while selecting the range of alternatives and the key issues analyzed in this draft environmental impact statement (EIS).

The scoping process began early in 1979 and continued in December of 1979, with a public meeting in Glasgow which identified Bitter Creek as a wilderness study area (WSA). The Bureau of Land Management (BLM) received approximately 2,000 responses to their meeting in opposition of the WSA study. Many of these letters and verbal comments helped in formulating the issues analyzed in this draft.

In March 1980, the Montana Wilderness Final Inventory Decision -Bitter Creek was released and then protested by more than 1,600 individuals and groups who wanted the area removed from wilderness study status. The study was then delayed by 28 appeals made to the Interior Board of Land Appeals (IBLA). The IBLA ruled on these appeals in favor of BLM on April 6, 1986, and cleared the way for the WSA study.

On July 29, 1983, a Federal Register notice announced the study and invited all interested parties to comment on issues and possible study alternatives.

At the same time news releases announcing the WSA study and soliciting comments on issues and possible study alternatives appeared in local papers in eastern Montana. Both the Federal Register notice and the news releases announced open houses to be held in Glasgow, Montana on August 10 and 11, 1983.

These news releases were followed by an issue brochure mailed to 2,000 individuals on the Bitter Creek mailing list. This brochure listed the areas of concern identified by the inventory process as well as a possible range of alternatives and requested comments on these issues and alternatives.

The Governor of Montana was briefed on the study and asked to tour the area as part of the public input process. In addition, the Grazing Advisory Board and the Multiple Use Advisory Board of the Lewistown BLM District were briefed on the issues and asked to expand on them if necessary. Both boards were invited to tour the study area. In October 1983, the Governor's Wilderness Review Committee and both boards toured the study area. While no comment was provided on issues or alternatives by the Governor's Wilderness Review Committee, both advisory boards passed a unanimous resolution supporting a No Wilderness Alternative for the Bitter Creek WSA and reiterated the issues identified in the preliminary brochure.

During the initial round of public involvement in late 1979 and 1980, approximately 50 personalized letters, 1,400 form letters and a petition with 102 signatures were received. Fewer than 10 of these letters supported studying the Bitter Creek area for wilderness designation. The petition and all form letters were against any wilderness designation. Very little interest from people outside the local area was indicated at this time.

During subsequent stages of public involvement in 1983, input was received via individual letters, comments solicited at open houses and a petition. Approximately 400 people (99% from the local area) signed a petition against wilderness designation. Of the 45 letters received, 40 were against designation. Nineteen out-of-area and 10 out-of-state letters were received. Of the out-of-area letters, 5 were in favor of designation and 14 were against. Of the out-of-state letters 4 were in favor of designation and 6 were against. Of the 97 comments received at the open houses, 93 listed problems associated with designation and 4 indicated a positive attitude toward designation. Only two alternatives were offered by the public; the All Wilderness and No Wilderness Alternatives.

There were a number of issues identified during the scoping process. Some are discussed in each alternative. A few comments were identified that were either outside the scope of this study or were concerns that would not be affected by the proposed action or any of the alternatives. Many of the comments indicated concern over whether the area met wilderness criteria. Whether the naturalness of the area has been impaired because of roads, reservoirs and relics from homesteader days is addressed under the Wilderness Values section of Chapter 3. A concern over BLM's use of the generic term "short grass prairie" during the inventory phase of the wilderness review is not addressed by alternative although it appeared in many comments. In scientific fact, Bitter Creek contains a mixture of prairie grasses, shrubs, juniper, aspen and cottonwood and is not a true short grass prairie, but is definitely a prairie. The fact that the area is prairie is discussed in the analysis of wilderness values in Chapter 3.

Concerns regarding other wilderness values including outstanding solitude and recreation are discussed in the wilderness resource portion of Chapter 3. Other concerns addressed under Recreational Access Levels include whether the WSA would provide for and attract wilderness recreationists and the impact of the loss of vehicle use of the WSA. This latter concern was voiced by elderly people who may wish to visit old homesteads as well as hunters who need vehicles to retrieve game. The impacts of changes in the number of hunters are discussed under both the Mule Deer Population and Recreational Access/Use Levels sections in Chapter 4.

Additional concerns raised by the public include access to inholdings, the expense of wilderness management and the difficulty of discerning boundaries on the ground.

These are discussed under Wilderness Impacts in Chapter 4. Concerns regarding impacts to the regional economy and county tax base due to changes in ranch operations and prohibitions on oil and gas development were also mentioned. Impacts of changes in ranch operation costs are discussed in the Economic Impact section. Potential tax losses were not estimated because it's impossible to predict drilling success in this WSA.

Other comments focused on the impacts of designation on individual ranching operations. Impacts of changes in policy regarding amount of noxious weeds, predator (coyote) control, range improvements and vehicle use are discussed with financial considerations presented under Ranch Related Economic Impacts. These sections address current policies. However, concern regarding potential policies is also evident and is addressed under the Social Conditions portions of Chapter 3.

Additional general comments included leaving the land in multiple use; even if designation does not occur the land will not change and there is no local support for designation. The first comment is addressed for each resource. The latter comment regarding local attitudes is addressed in the Social Conditions portion of Chapter 3.

Those individuals who favored designation did so because they believe prairie ecosystems should be represented in the National Wilderness Preservation System and because the area has historical value because of its homesteading days. They also indicated that the loss of county taxes would not be as great as others have indicated.

Social issues raised during scoping include the perception that wilderness designation would be a genuine threat to the local ranching lifestyle. Even if current policy does not substantially affect operations, there is concern that policies may change in the future as administrations change. For example, many people were convinced that grazing permits would be cut or be eliminated in the future. In addition, residents view this designation as a loss of local autonomy to determine how their area is managed. Attitudes toward the BLM would be affected by designation, making it harder for the BLM to work with the local community and individual operators. In addition, attitudes toward designation would make enforcement difficult, especially given the lack of "on-the-ground" boundaries.

The No Wilderness Alternative is supported overwhelmingly by local people. In addition, there is little evidence of support for designation outside the local area. Problems that would be encountered after designation include actual management of the area and increased attitude problems encountered by BLM in dealing with the local populace. All these were considered by management in selecting the "No Wilderness Alternative" as BLM's proposed action as well as the other alternatives.

The draft EIS was prepared by resource specialists from the BLM's Valley Resource Area Office and the Lewistown District Office with assistance from the Montana State Office. The disciplines and skills used to develop this EIS were: vegetation and range use, animal husbandry, soils, recreation, climate, sociology, economics, printing, public affairs and typing.

## COMMENTS REQUESTED

Comments on the draft EIS have been requested from the following agencies and organizations and individuals too numerous to list.

### Congressional Offices

Office of Senator Baucus  
Office of Senator Melcher  
Office of Congressman Marlenee  
Office of Congressman Williams

### Federal Agencies

Council on Environmental Quality  
Department of Agriculture  
Forest Service  
Soil Conservation Service  
Department of the Air Force  
Department of the Army  
Corps of Engineers  
Department of Energy  
Federal Energy Regulatory Commission  
Department of the Interior  
Bureau of Mines  
Bureau of Reclamation  
Fish and Wildlife Service  
Geological Survey  
Environmental Protection Agency  
Department of Transportation  
Bureau of Indian Affairs  
National Park Service  
Federal Aviation Administration

### County Commissioners and Planning Boards

Sheridan County  
Daniels County  
Valley County  
Roosevelt County  
Phillips County  
Blaine County

### Other Organizations

Montana Wildlife Federation  
Sierra Club  
Environmental Information Center  
Northern Plains Resource Council  
Montana Wilderness Association  
Montana-Wyoming Rep. The Wilderness Society  
Montana Rep. Defenders of Wildlife  
Montana Guides and Outfitters Association  
Western Environmental Trade Association  
Five Valley Audubon Society  
Friends of Earth  
Missouri Breaks Multiple Use Association  
Montana Wilderness Institute  
Montana Stockgrowers  
North Central Montana Stockgrowers Association  
Montana Public Lands Council

## State Agencies and Organizations

Montana Department of Agriculture  
Montana Department of Fish, Wildlife, and Parks  
Montana Department of Natural Resources and  
Conservation  
Montana Department of Revenue  
Montana State Historic Preservation Officer  
Office of the Governor  
Governor's Natural Resources Council

## CONSISTENCY WITH OTHER PLANS

The Federal Land Policy and Management Act requires that BLM plans be as consistent as possible with other agency plans, while considering Federal laws, policies and regulations.

Other Federal agency, city, county and state plans in the EIS area were considered in the preparation of this document.

## STATE OF MONTANA

A recently signed Memorandum of Understanding among the BLM, the Forest Service and the Governor created the

Natural Resources Council. This council will serve as a clearing house for consultation on all natural resource issues. This group will study the recommendations of this report for consistency.

## CITY-COUNTY PLANS

No specific conflict with this wilderness study has been identified in any city or county plans.

## PUBLIC COMMENTS ON THE DRAFT EIS

The following section includes the public input received on the draft EIS. The summary of public comments lists those individuals who commented. It is followed by the reprinted public hearing transcripts and letters. Certain comments required further clarification, either within the text or as supplemental information. The BLM's responses to the public comments follow the reprinted transcripts and letters.

## Summary of Public Comments on the Draft EIS

|  | Written<br>Comments<br>(Letter<br>Number) | Oral<br>Comment<br>(Hearing) | BLM<br>Response<br>Provided |
|--|---|------------------------------|-----------------------------|
| <u>Federal Agencies</u>                      |   |                              |                             |
| Department of Health and Human Services      | 2   |                              | X                           |
| National Park Service                        | 3   |                              |                             |
| U.S. Environmental Protection Agency         | 1   |                              | X                           |
| <u>State &amp; Local Government Agencies</u> |   |                              |                             |
| Montana State Historic Preservation Office   | 4   |                              |                             |
| Valley County Board of County Commissioners  | 5   |                              |                             |
| <u>Organizations</u>                         |   |                              |                             |
| Glasgow Chamber of Commerce                  | 6   |                              |                             |
| Montana Assoc. of Conservation Districts     | 12  | Helena                       |                             |
| Montana Public Lands Council                 | 7   |                              |                             |
| Montana Wilderness Association               |   |                              |                             |
| - Bill Cunningham                            | 11  | Helena                       | X                           |
| The Wilderness Society                       | 8   |                              | X                           |
| Valley County Development Council            | 10  | Glasgow                      |                             |
| Wildlife Management Institute                | 9   |                              | X                           |
| <u>Individuals/Businesses</u>                |   |                              |                             |
| Ellen Arguimbau                              | 27  |                              |                             |
| Irene Baker                                  | 43  |                              |                             |
| Manson Bailey, Jr.                           |   | Glasgow                      |                             |
| Donna Becker                                 | 67  |                              |                             |
| Gary Benett                                  | 51  |                              |                             |
| Anna Berge                                   | 68  |                              |                             |
| Alice Black                                  | 47  |                              |                             |
| John Black                                   |   | Glasgow                      |                             |
| Gertrude Bush                                | 52  |                              | X                           |
| Douglas Chadwick                             | 32  |                              | X                           |
| Martin Connell                               |   | Glasgow                      |                             |
| Michael Colavito                             | 45  |                              | X                           |
| Stuart Doggett                               |   | Helena                       |                             |
| Nancy Eagleton                               | 66  |                              |                             |
| Christin Englehardt                          | 40  |                              |                             |
| Kim Enkured                                  | 23*, 24                                   | Glasgow                      |                             |
| Joe Etchart                                  |   | Glasgow                      |                             |
| Gene Etchart                                 | 19, 28                                    | Glasgow/<br>Helena           | X                           |
| Mark Etchart                                 | 21  | Glasgow                      |                             |
| Jackie Gollay                                | 40  |                              | X                           |
| Rick Graetz - Montana Magazine               | 29  |                              |                             |
| David Gregory                                | 53  |                              |                             |
| Jamie Hanson                                 | 78  |                              |                             |
| Kyle Hapstad                                 |   | Glasgow                      |                             |
| Charles M. Hauptman                          | 13  |                              |                             |
| Andrew Hellsten                              | 79  |                              |                             |
| August Heutz                                 | 69  |                              |                             |



|                                    | Written<br>Comments<br>(Letter<br>Number) | Oral<br>Comment<br>(Hearing) | BLM<br>Response<br>Provided |
|------------------------------------|---|------------------------------|-----------------------------|
| <u>Individuals/Businesses</u>      |   |                              |                             |
| Tom Hickok                         | 54  |                              |                             |
| Jim Hodge                          |   | Helena                       |                             |
| A.J. Hoffman                       | 70  |                              |                             |
| Mary Hoffman                       | 71  |                              |                             |
| M. Hoffman                         | 14  |                              | X                           |
| George Holton                      | 46  |                              |                             |
| Helen Hunter                       | 66  |                              |                             |
| Eric Jauhainen                     | 35  |                              | X                           |
| Mark Jauhainen                     | 34  |                              | X                           |
| DuWayne and Edith Johnson          | 80  |                              |                             |
| Michael Johnson                    | 81  |                              |                             |
| Jesse Lacock                       | 55  |                              |                             |
| Mark Lane                          | 73  |                              |                             |
| Mildred Leonard                    | 44  |                              | X                           |
| O.E. Markle                        | 25  | Glasgow                      |                             |
| James Mattfeldt                    | 56  |                              |                             |
| James McCauley                     | 41  |                              | X                           |
| Susan MCCauley                     | 41  |                              | X                           |
| Tom McCarvel                       | 48  | Helena                       |                             |
| Dana McColly                       | 48  |                              |                             |
| Edrie McColly                      | 57  |                              |                             |
| Elenor McColly                     | 82  |                              |                             |
| J.C. McColly                       | 74  |                              |                             |
| Robert McColly                     | 18  | Glasgow/<br>Helena           |                             |
| Tim McColly                        | 49  |                              |                             |
| Joan Melby                         | 83  |                              |                             |
| Steve Meyer                        |   | Helena                       |                             |
| Alex Mogan                         | 84  |                              |                             |
| J.R. Mitchell - Atlantic Richfield | 22  |                              |                             |
| Harold Nelson                      | 36  |                              |                             |
| Mable Nelson                       | 58  |                              |                             |
| Tom Nelson                         | 59  |                              |                             |
| Karen Nielsen                      | 42  |                              | X                           |
| Kenneth Newton                     | 60  |                              |                             |
| Tom Newton                         | 61  |                              |                             |
| Robert Oset                        | 30  |                              | X                           |
| N.H. Patrick                       | 85**                                      |                              |                             |
| Kathy Pimley                       | 62  |                              |                             |
| Donna Qualey                       | 75  |                              |                             |
| Paul Richards                      | 20  |                              | X                           |
| JoJo Romero                        |   | Helena                       |                             |
| John and Eleanor Rosendahl         | 50  |                              |                             |
| Noel Rosetta                       |   | Helena                       | X                           |
| John Rusher                        | 63  |                              |                             |
| Blanche Schuler                    | 65  |                              |                             |
| Bruce Schuler                      | 64  |                              |                             |
| Reed Secord                        | 17  |                              | X                           |
| Carol Sibley                       | 37  |                              |                             |
| Duane Sibley                       | 39  |                              |                             |
| Dwight Sibley                      | 38  |                              |                             |
| Gladys Silk                        | 26  | Glasgow                      |                             |

|                               | Written<br>Comments<br>(Letter<br>Number) | Oral<br>Comment<br>(Hearing) | BLM<br>Response<br>Provided |
|-------------------------------|---|------------------------------|-----------------------------|
| <u>Individuals/Businesses</u> |   |                              |                             |
| Lee Silliman                  | 33  |                              |                             |
| Sidney Simonsen               | 76  |                              |                             |
| Stanley N. Smith              | 31  |                              | X                           |
| John Stultz                   |   | Helena                       | X                           |
| John R. Swanson               | 87  |                              | X                           |
| John Swanson                  |   | Glasgow                      |                             |
| Magnus Swenson                | 86  |                              |                             |
| Mons Teigen                   |   | Helena                       |                             |
| Donald Timm                   |   | Helena                       |                             |
| Marlen Tweten                 | 15  |                              | X                           |
| Wm. Vaughey Jr.               | 16  |                              |                             |
| L. Vaughn                     | 66  |                              |                             |
| Lori Watson                   | 40  |                              |                             |
| Milo Westburg                 |   | Helena                       |                             |
| Tom Wilde                     | 72  |                              | X                           |
| Leo Williams                  | 77  |                              | X                           |

\*257 additional cards were received. 228 supported the proposed action and 29 supported other than the proposed action.

\*\*22 additional identical letters were received.

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

PUBLIC HEARING REGARDING THE  
BITTER CREEK WILDERNESS DRAFT  
ENVIRONMENTAL IMPACT STATEMENT } TRANSCRIPT OF  
PROCEEDINGS

Tuesday, May 22, 1984  
7:30 P.M.  
Courtroom  
Wiley County Courthouse  
Glasgow, Montana

APPEARANCES:

EUGENE RUSSELL, Hearing Officer

BLM - BUREAU OF LAND MANAGEMENT  
OFFICE OF THE HEARING OFFICER  
1000 WEST 10TH AVENUE  
SPOKANE, IDAHO 83402

Participants:

|                    |    |
|--------------------|----|
| Martin Connell     | 5  |
| Robert McColly     | 6  |
| John Swanson       | 6  |
| Joe Stohart        | 7  |
| Gladys Silk        | 7  |
| Kyle Hapstead      | 8  |
| Mark Stohart       | 8  |
| Manson Bailey, Jr. | 9  |
| Kim Enkured        | 10 |
| O. E. Markle       | 10 |
| John Black         | 10 |

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OFFICE OF THE HEARING OFFICER  
1000 WEST 10TH AVENUE  
SPOKANE, IDAHO 83402

PROCEEDINGS

MR. RUSSELL: This is a public hearing on the Bitter Creek Draft Wilderness Suitability Study Environmental Impact Statement.

The Bureau of Land Management recently completed a Draft Suitability Study Environmental Impact Statement for the Bitter Creek Wilderness Study Area in the Lewistown District. The study area includes a total of 59,660 acres of public lands. The Draft Document was mailed to all known interested parties on March 29, 1984.

The preferred alternative proposes that Congress not designate any part of the 59,660 acre study area as wilderness.

This hearing is being held by the Bureau of Land Management in compliance with Section 3(d)(1)(B) of the Wilderness Act of September 3, 1964, for the purpose of accepting testimony from anyone who could be affected by the recommendations.

I am Eugene Russell, and I am on the state director's staff of the Bureau of Land Management in Billings. I will be conducting the hearing this evening. A court reporter is here to record the proceedings. Testimony will be accepted relevant to the recommendation set forth in the Suitability Study EIS previously identified. Testimony relating to other issues will not be considered. To ensure that everyone has an opportunity to have his testimony heard, I ask that as nearly as possible

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your remarks be limited to the recommendations and environmental consequences identified in the Draft Document.

This is not a debate forum. This is an informational gathering hearing. There are people here that are very familiar with the statement that you can get questions asked-- answered after the hearing is closed.

I would like to remind you at this time if you have not already done so to please register at the door and indicate if you wish to make an oral or written statement.

The statements received will be analyzed by the Lewistown District Office. The written record of that analysis as well as transcripts of the hearing will be prepared and made available for inspection in the Lewistown District Office. If you wish to purchase copies of the transcript of this hearing, please leave your name and address with the court reporter.

The analysis of the testimony received will be used to determine what changes, if any, will be required in the recommendations set forth in the document. The analysis of the testimony and a copy of the transcript will be incorporated in the final Environmental Impact Statement and Wilderness Study Report which will be transmitted to the Secretary of the Interior, the President and Congress. Copies of the final documents will also be provided to all known interested parties following concurrence and signature by the Secretary of the Interior.

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Are there any questions? All right. And first  
like to call on Martin Connell.

MR. CONNELL: Where--

MR. RUSSELL: Just there as long as the court  
reporter can hear you.

MR. CONNELL: My name is Martin Connell. I am from  
Glasgow. I support the no-wilderness alternative because it  
is what the overwhelming majority of the local people want.  
It will best keep the land in its natural state. It will save  
the taxpayers dollars. The land will continue to provide jobs  
in generations to come and the area will be available for hunt-  
ing.

Regarding the Bitter Creek East alternative, I feel  
that this should be struck from the recommendations because it  
represents oppressive discrimination. One operator, Westland  
Ranch, will bear the financial and emotional hardship of the  
wilderness because this is the only operator included in this  
alternative.

I would also like to point out that on Page A6 under  
common animal species in the wilderness study area that they  
list the gray wolf, and I do not believe that you can document  
that that is a common species in the wilderness study area.

I would like to commend the BLM and its staff on per-  
petuating the basic principles of democracy by listening to the  
people, gathering the facts and making the recommendation of

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DATE: 10/1/88  
BY: [REDACTED]

no wilderness which is the only alternative. It would appear to me  
first place as the only alternative. It would appear to me  
that if other government agencies would approach local problems  
as the BLM has in this case there would be more harmony.

Thank you.

MR. RUSSELL: Thank you, Mr. Connell.

Bob McColly.

MR. MCCOLLY: My name is Robert McColly. My address  
is Hinsdale, Montana. I have a very short statement, and it is  
a statement approving and commending the BLM recommendation of  
no-wilderness alternative for Bitter Creek Study Area.

It certainly is a privilege and a pleasure for me to  
commend the BLM for the very practical and sensible recommenda-  
tion of the no-wilderness alternative in the analysis of the  
environmental review of the Bitter Creek Wilderness Study Area.

The no-wilderness recommendation has increased many-  
fold the confidence and faith of those of us who are close to  
the land in the judgmental decisions of the Bureau of Land  
Management, the stewards of our public lands.

Thank you for a most intelligent recommendation.

MR. RUSSELL: Thank you, Mr. McColly.

John Swanson.

MR. SWANSON: My name is John Swanson, somebody  
that's directly affected with the farmers and ranchers in this  
area, as we are in business. I am very happy to see that the

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DATE: 10/1/88  
BY: [REDACTED]

BLM is looking at the no-wilderness support or no-wilderness  
designation for the Bitter Creek area, and I am such in  
support of that. That's all.

MR. RUSSELL: Thank you, John.

Joe Etchart.

MR. ETCHART: I am Joe Etchart. My address is  
Glasgow, and I would just like to be on the record saying that  
I firmly believe that BLM arrived at the right conclusion in  
their Bitter Creek study and that the no-wilderness recommenda-  
tion seems to be the most practical.

Thank you.

MR. RUSSELL: Thank you, Mr. Etchart.

Gladys Silk.

MS. SILK: I am Gladys Silk, the editor of the  
Glasgow Courier.

I am not going to read this entire statement, but we  
do want to take this opportunity to thank the BLM for allowing  
this public hearing on the Bitter Creek Draft Environmental  
Statement. We support the BLM's recommendation of no wilder-  
ness. They are to be congratulated for a job well done on  
this EIS.

We only have one complaint about the EIS. We object  
to the drawings of the black-footed ferrets which may prompt  
someone to believe people and activity could threaten that  
animal's existence when in fact all the fine-tooth combing

BLM REPORTING REQUIREMENTS  
DATE: 10/1/88  
BY: [REDACTED]

through the Bitter Creek has not unearthed any clues to the  
possibility of ferrets inhabiting the area.

Thank you very much.

MR. RUSSELL: Thank you, Kyle Hapstad.

MR. HAPSTAD: My name is Kyle Hapstad. I am a  
resident of Glasgow and speaking on behalf of the Chamber of  
Commerce as a past president.

We support and approve of the recommendation of no-  
wilderness alternative. We support the idea of hunting, big  
game and bird hunting, on the wilderness area. We also  
support many of our friends who earn their living in most  
cases off of that land, our ranchers, who need that area for  
grazing. We support the idea of more jobs, income and  
resource availability in our--in our county. We commend your  
conclusion.

Thank you.

MR. RUSSELL: Thank you, Mark Etchart.

MR. ETCHART: My name is Mark Etchart, State Senator,  
Senate District 2, and I want to testify on behalf of the no-  
wilderness alternative as adopted by the BLM and echo the  
statements of Dr. Connell and others before me in congratulat-  
ing you on a job well done.

I would also ask that previous testimony that I have  
offered in other hearings be made part of the record and,  
again, favor the no-wilderness alternative.

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BY: [REDACTED]

and you.

MR. RUSSELL: Thank you, Mark.

Mason Bailey, Jr., Mansom. I am sorry, Mansom Bailey.

MR. BAILEY: Mr. Russell, I am Mansom Bailey from

Glasgow. I will read a portion of the statement and submit the rest for the record.

This is presented by the Valley County Development Council, and this organization is the designated Overall Economic Development Program Committee for Valley County in a coordinating capacity. The executive board is assembled with broad representative interests.

Statement: On April 10, 1984, this board, in regular-scheduled meeting, reviewed the Draft Bitter Creek Wilderness EIS and were pleased with BLM's number one recommendation for proposed action by, and quote, no wilderness--no acreage would be recommended for wilderness designation, unquote. In action taken the board confirms in this recommendation of no-wilderness designation in the Bitter Creek area and further authorizes the VCDC director to present a statement at public hearing with additional information or reiteration of past testimony for this.

It is again recognized that in the following--that in following through on the edict of the U. S. Congress to inventory and study public lands for wilderness values the BLM personnel have extended considerable effort in research,

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should be commended in taking the position that they have other places to spend money and we can better get on with the job of having administration of our public lands as a whole rather than wilderness areas per se.

MR. RUSSELL: Thank you, Mr. Black.

Are there any other comments?

All right. In closing the record, I would like to remind you that the testimony received at this hearing will be available in the form of a transcript, and if you wish to receive copies of the transcript please leave your name and address with the court reporter.

You are also reminded that all testimony will be analyzed by the Lewistown District manager and a written report of the analysis will be prepared and will be available for inspection at the Lewistown District office. The analysis of this testimony will be used to determine what changes, if any, are required in the wilderness suitability recommendations.

The final recommendations will be forwarded to the President following concurrence and signature by the Secretary of the Interior.

The hearing is closed. However, the record shall remain open until July 20, 1984. We urge you to contact those who could not make it to this hearing and have them submit their written comments.

There will be another hearing held in Helena on

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shall be held and continuing to be a part of the process.

We thank you for the number of excellent actions which you have presented.

MR. RUSSELL: Thank you, Mr. Bailey.

Kim--I won't try the last name.

MR. ENKURED: I am Kim Enkured, and I work for the Valley County Grazing District, and I would like to submit my opinion that the no-wilderness alternative on Page 5 of the Bitter Creek Wilderness Environmental Impact Statement is a very good decision of BLM, and I would like to also submit a list of people that also agree with this decision.

MR. RUSSELL: Thank you, Kim.

O. E. Markle.

MR. MARKLE: My name is O. E. Markle. I am a businessman in Glasgow. I have lived here all my life, and I would like to go on record as supporting the BLM's recommendation of no wilderness in the Bitter Creek area, excuse me, Bitter Creek area.

MR. RUSSELL: Thank you, Mr. Markle.

John Black.

MR. BLACK: My name is John Black. I am one of the permittees that would be affected by the proposed wilderness, and I certainly agree with the BLM and think they have done a good job in this study recommending no wilderness. Also, part of this study, and I think it's recognized, and I think they

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Thursday of this week at 7:30 at the Jorgenson's Holiday Motel, so if any of you know people that want to make a statement there will be another hearing this week.

BLM people will stay a while to answer any questions you may have concerning the document itself or for any clarification, and I appreciate all of you coming tonight and providing us with your testimony.

The hearing is closed. Thank you.

(The hearing was then concluded at the hour of 7:57 p.m., this 22nd day of May, 1984.)

I, Harry G. Rauch, a Certified Shorthand Reporter and Registered Professional Reporter, do hereby certify that I took down in stenotype the proceedings had on the subject hearing at the time and place hereinbefore set forth and that the foregoing twelve (12) pages constitute a full, true and correct transcript of my stenotype notes of said proceedings.

Dated this 11th day of June, 1984.

Certified Shorthand Reporter  
and  
Registered Professional Reporter

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RTR 117  
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SPOKANE, IDAHO 83402



BEFORE  
UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

PUBLIC HEARING REGARDING THE ) TRANSCRIPT OF  
BITTER CREEK WILDERNESS DRAFT )  
ENVIRONMENTAL IMPACT STATEMENT ) PROCEEDINGS

Thursday, May 24, 1984  
7:30 p.m.  
Jergensen's Holiday Motel  
Helena, Montana

APPEARANCES:

EUGENE RUSSELL, Hearing Officer

BLM-10 SHORTLANDS REPORTING  
JULY 1984  
JULY 1984  
JULY 1984

Participants:

|                 |    |
|-----------------|----|
| Robert McColly  | 5  |
| Donald Tinn     | 5  |
| Tom McCarvel    | 6  |
| Steve Meyer     | 6  |
| Noel Rosetta    | 7  |
| Gene Eickhart   | 8  |
| Bill Cunningham | 12 |
| Stuart Doggett  | 20 |
| Jim Hodge       | 22 |
| John Stults     | 25 |
| Milo Vestburg   | 26 |
| Jojo Romero     | 27 |
| Mona Teigen     | 28 |

BLM-10 SHORTLANDS REPORTING  
JULY 1984  
JULY 1984  
JULY 1984

PROCEEDINGS

MR. RUSSELL: This is a public hearing on the Bitter Creek Draft Wilderness Suitability Study Environmental Impact Statement.

The Bureau of Land Management recently completed a Draft Suitability Study Environmental Impact Statement for the Bitter Creek Wilderness Study Area in the Lewistown District. The study area includes a total of 59,660 acres of public lands. The Draft Document was mailed to all known interested parties on March 29, 1984.

The preferred alternative that Congress does not-- preferred alternative proposes that Congress not designate any part of the 59,660 acre study area as wilderness.

This hearing is being held by the Bureau of Land Management in compliance with Section 1(d)(1)(B) of the Wilderness Act of September 7, 1964, for the purpose of accepting testimony from anyone who could be affected by the recommendations.

I am Eugene Russell, and I am on the state director's staff of the Bureau of Land Management office in Billings. I will be conducting the hearing. A court reporter is here to record the proceedings. Testimony will be accepted relevant to the recommendation set forth in the Suitability Study EIS previously identified. Testimony relating to other issues will not be considered. To ensure that everyone has an opportunity

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JULY 1984  
JULY 1984  
JULY 1984

to have his testimony heard, I ask that as nearly as possible your remarks be limited to the recommendations and environmental concerns identified in the Draft Document.

I might add this is not a forum for debate. This is information gathering, and there are several BLM members that will be here to answer any questions you have after the--the hearing.

I would like to remind you at this time, if you haven't already done so, to please sign in, and if you wish to make a statement, either written or oral, fill out one of these cards, and I will call your name.

The statements received will be analyzed by the Lewistown District Office. The written record of that analysis as well as transcripts of the hearing will be prepared and made available for inspection in the Lewistown District Office. If you wish to purchase copies of the transcripts of this hearing, please leave your name and address with the court reporter.

The analysis of the testimony received will be used to determine what changes, if any, will be required in the recommendations set forth in the document. The analysis of the testimony and a copy of the transcript will be incorporated in the Final Environmental Impact Statement and Wilderness Study Report which will be transmitted to the Secretary of the Interior, the President and Congress. Copies of the final documents will also be provided to all known interested parties

BLM-10 SHORTLANDS REPORTING  
JULY 1984  
JULY 1984  
JULY 1984

Following a question and answer by the Secretary of the Interior.

Are there any questions before we proceed?  
I would now like to call upon Bob McColly.

MR. McCOLLY: My name is Robert McColly. I live at Missoula, Montana. My statement is a short statement that is approving and commending the BLM recommendation of no-wilderness alternative for the Bitter Creek Study Area.

It certainly is a privilege and a pleasure for me to commend the BLM for the very practical and sensible recommendation of the no-wilderness alternative in the analysis of the environmental review of the Bitter Creek Wilderness Study Area.

The no-wilderness recommendation has increased manyfold the confidence and faith of those of us who are close to the land in the judgmental decisions of the Bureau of Land Management, the stewards of our public lands.

Thank you for a most intelligent recommendation.

MR. RUSSELL: Thank you, Mr. McColly.

Donald Timm.

MR. TIMM: My name is Donald Timm, Missoula. I am one of the grazing permittees affected by the wilderness proposal and testifying in favor of the BLM's no-wilderness decision for the Bitter Creek area.

My reasons are the extreme difficulty in controlling motorized access because of no natural boundaries, the extra

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JULY 1974

expense and other factors. The difficulty of hunting for the majority of the people and the general unavailability of the area for wilderness due to the evidence of human habitation.

There is no recreational use for wilderness area that this area could not already be used for, so with all the disadvantages for wilderness designation and no advantages I wish to commend the Bureau of Land Management for an intelligent decision.

Thank you.

MR. RUSSELL: Thank you, Mr. Timm.

Tom McCarvel.

MR. McCARVEL: My name is Tom McCarvel. I live in Helena. I have lived in the state most of my life.

I am very familiar with the area that this study looked at. I have hunted in the area, worked in the area, and I am pleased to take this opportunity to say that I am very supportive of the action which the group has suggested here which is the no-wilderness alternative.

Thank you.

MR. RUSSELL: Thank you, Mr. McCarvel.

Steve Meyer.

MR. MEYER: My name is Steve Meyer. I represent the Montana Association of Conservation Districts, an organization that represents the fifty-nine soil and water conservation

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BULLY MOUNTAIN, MONTANA  
JULY 1974

districts in the State of Montana.

I am here to support the proposal alternative with no wilderness. We passed a resolution in our state association at our latest meeting supporting that stand.

MR. RUSSELL: Thank you, Mr. Meyer. I am sorry I mispronounced your name.

MR. MEYER: That's okay.

MR. RUSSELL: Mr. Rosetta.

VOICE: Gene, I wonder if we could ask people to use the mike so we can hear a little more plainly.

MR. ROSETTA: I think you can hear me.

My name is Noel Rosetta, and we wish to go on record as supporting the wilderness proposal and opposing the BLM proposal, and I represent the Last Chance Audubon Chapter society here in Helena.

I have hunted and hiked and run range surveys in the badlands and semi-badlands of Eastern Montana over a number of years. I know some of its people, particularly in the Lower Musselshell, where my wife's folks homesteaded and ranched.

Although some Eastern Montanans may not completely agree with me, I think some of these areas should be left the way they were when the buffalo grazed them and as the pioneers found them. Bitter Creek is such an area. It has high value for wildlife, game grass, for some livestock grazing, and for wilderness style recreation.

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Land like Bitter Creek is fast disappearing. These lands would contribute more to modern-day society left as they are than changed by modern-day culture. It could mean even more as a tribute to Montana's past and to its pioneers, and I would take less than one percent of BLM's land in Montana and, as a matter of fact, as I understand it, it's the only wilderness to date, if it were approved, that would be on Montana land, and Eastern Montana really doesn't have very many wildernesses today.

Thank you.

MR. RUSSELL: Thank you, Mr. Rosetta.

Gene Etchart.

MR. ETCHART: Maybe I would use the mike. Is this working?

MR. RUSSELL: Sounds like it.

MR. ETCHART: All right. I have a--I have a copy of this statement that I can give you later.

My name is Gene Etchart. I am a lifelong resident of Valley County, Montana, and have for some thirty-five years been a grazing permittee within the area of the Bitter Creek Wilderness Proposal.

Let me say it in the beginning that I concur wholly with the proposed action of the BLM, and that is, of course, the no-wilderness designation in this instance.

I did attend a hearing in Glasgow two nights ago and

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JULY 1974  
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JULY 1974

1 would want to amend a bill on some of the testimony brought out  
2 there. In the appendix in the Bitter Creek Document, the gray  
3 wolf is listed as a threatened or endangered species common in  
4 the area. To the best of my knowledge, this species has been  
5 extinct in Valley County since 1923 when the last gray wolf  
6 was killed and is now a rug in the care of the Valley County  
7 Museum. Likewise, the black-footed ferret I don't think has  
8 been seen in Valley County for some forty years or more.

9 While the EIS points out that there are some 8,000  
10 acres of land within the boundaries of the--of the proposed  
11 area that was once in private ownership, I would like to point  
12 out that Mr. Massou Bailey, who is executive secretary of the  
13 Valley County Development Council, did some research in the old  
14 land plats and he has determined that--through those records  
15 that some 24,000 acres of land within the boundaries of this  
16 proposed wilderness were at one time filed on for homestead.

17 Now, while it's true that not all of those lands  
18 went into--went to patent or went into private ownership,  
19 nevertheless, those homesteaders, many of them, lived on those  
20 lands, plowed them, picked rock off of them and left evidence  
21 of their presence, and I would point out that these--these  
22 homestead lands are widely dispersed all through the area.

23 Early in the study process some felt that Bitter  
24 Creek was--Bitter Creek area represented a unique short prairie  
25 grass eco system and should be included in the wilderness

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1 success of the present type of multiple use management would  
2 be--would lie in pointing out that in this wilderness study  
3 area where practically no game existed fifty years ago that  
4 last fall the Montana Fish and Game Commission designated a  
5 special hunting season and a quota of a thousand additional  
6 antler--antlerless mule deer to be taken over and above the  
7 normal hunting harvest, and this in the general area including  
8 Bitter Creek.

9 To designate this area as wilderness would prevent  
10 sportsmen from having the needed access to harvest the game  
11 crop. The result would be wasteful and certainly not in the  
12 public interest.

13 Some forty Valley County residents turned out in  
14 Glasgow on May 22nd relative to the Bitter Creek EIS. All of  
15 these people in one way or another testified in favor of the  
16 alternative chosen by the BLM and that being no wilderness.  
17 As has been pointed out in the EIS, the vast majority of the  
18 local people in the Valley County area opposed the formation  
19 of the wilderness in the Bitter Creek. I think that it is an  
20 example of the public participation process working, that BLM  
21 has weighed the comments of the various publics who have  
22 testified and have come up with a recommendation which is so  
23 widely approved of in the Valley County area and which was  
24 unanimous in support at the May 22nd hearing in Glasgow. BLM  
25 is to be commended for coming up with a sound, sensible

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1 I was given the ALBINO Jack rabbit which is part of the  
2 Range Science Division at Montana State University, to make a  
3 study and report on this subject. Dr. Taylor found out--Dr.  
4 Taylor reported that the area was neither unique nor was it a  
5 short grass prairie system.

6 A very similar area comparable to the Bitter Creek  
7 insofar as the eco system is concerned has already been  
8 designated wilderness, and that's known as the L. U. Bend  
9 Wilderness Area. It's in South Phillips County just on the  
10 north edge of the Fort Pack Lake.

11 In my opinion, BLM decided correctly that the soli-  
12 tude opportunities are limited within the area, that the  
13 administration of the area as wilderness would be most costly  
14 if not impossible and that the boundaries would be very  
15 difficult to mark or define.

16 It is also my opinion that the present multiple use  
17 administration is the best type of administration for this  
18 area. Uses allowed include livestock grazing and production,  
19 wildlife production with recreational sportsmen having freedom  
20 to harvest the game and the availability of the land for gas  
21 exploration and production, and, incidentally, gas exploration  
22 and production is moving closer every year to this area in  
23 question.

24 Part of the proof that one might consider as to the

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1 decision after completing their study.

2 Thank you.

3 MR. RUSSELL: Thank you, Mr. Eichart.  
4 Bill Cunningham.

5 MR. CUNNINGHAM: I guess I will grab the mike, too,  
6 Mr. Chairman.

7 My name is Bill Cunningham. I am from Helena. I am  
8 conservation director for the Montana Wilderness Association,  
9 and I have a rather lengthy statement that I will try to  
10 summarize and leave a copy with you at the end of my oral  
11 remarks.

12 I first want to thank the BLM for conducting this  
13 important hearing concerning the future of the Bitter Creek  
14 Wilderness Study Area in Helena. A lot of us really can't  
15 afford the time and money to get all the way to Glasgow, so we  
16 appreciate you coming to our city to hold this hearing. The  
17 fact that you are holding a hearing in Helena in addition to  
18 the hearing held the other night in Glasgow is at least tacit  
19 recognition of the fact that the Bitter Creek wild-land  
20 resources are of more than just local significance. Indeed,  
21 the potential Bitter Creek Wilderness is a resource of state  
22 and national importance as well.

23 Unfortunately, the Draft Statement and the recommenda-  
24 tion for no wilderness in any portion of the Bitter Creek  
25 Wilderness Study Area fails to recognize this broader, longer-

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term significance. I am surprised and deeply disappointed that the BLM has thus far failed to make a positive wilderness recommendation for this special area, and I can only surmise that local pressure has unduly influenced the negative proposal.

I should state at the outset that I am somewhat familiar with the Bitter Creek Wilderness Study Area and I can personally attest to its wilderness suitability. I certainly don't have the depth of on-the-ground knowledge that many of the people here have who have already spoken, but I have been in the area several times.

On March 12, 1980, when I was working for the Wilderness Society I took an extensive aerial tour of the Bitter Creek Wilderness Study Area along with an on-the-ground tour into the center of the area. The purpose of the tour was to make recommendations to the BLM as to the routing of the Northern Border Gas Pipeline.

My recommendations, affirmative recommendations, for the pipeline route were based on the principle of utilizing existing utility corridors and maintaining the wilderness integrity of the wilderness study area. Attached to my statement is a copy of my March 14, 1980, letter to former BLM director, Mike Penfold, outlining these recommendations. The point that I am trying to make here is that we cooperated in good faith with the BLM and with industry to accommodate

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mitted within wilderness areas but also there have never been any stock--any reductions in grazing, in wilderness, because of wilderness designation.

We also discussed the fact that we as conservationists and members of conservation organizations strongly support the continuation of livestock grazing in wilderness and we support the grazing guidelines from the Idaho and the Colorado wilderness legislation which allow, among other things, the maintenance and improvement of grazing facilities within wilderness as well as the occasional use of motorized equipment in wilderness by the permittee when necessary for the administration of the grazing allotment.

In view of these guidelines that have been adopted by Congress and also incorporated into the wilderness management policies of the land management agencies, including the BLM, and in view of their incorporation within these management policies, I don't see why we have such strong opposition from some of the livestock producers, particularly with respect to wilderness in this area.

Wilderness management is the only form of federal land classification with a statutory guarantee that livestock grazing shall continue in wilderness where it existed at the time of designation of the area. This is guaranteed in Section 4(d)4 of the Wilderness Act of 1964.

Each time that I visited Bitter Creek, which has only

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development while preserving a vital part of our diminishing wilderness heritage.

As a result, I feel somewhat let down by the BLM's non-wilderness recommendation for Bitter Creek. I am particularly puzzled by the complete non-wilderness recommendation given the strength of the Bureau's resolve to keep the area in wilderness study area status despite the strong opposition from some of the local people to any wilderness consideration for Bitter Creek at all.

In June of 1980, I took part in a Montana Wilderness Association wilderness walk into the Bitter Creek Wilderness Study Area. We conducted a ten-mile hike through the eastern portion of the area with some of the local townspeople, some of the local people being on both sides of the issue of whether we should protect part of the Bitter Creek area as wilderness.

We had, I think, a good, open discussion of the wilderness characteristics of the area, and without question there are some impacts that would require boundary modifications. We discussed-discussed the issue of grazing in wilderness areas as well as the issue of the wilderness preservation question in general. We tried to clear up some of the anti-wilderness myths that have surrounded the question of wilderness for so many years.

I believe that--that many people locally were surprised to learn that--that not only is livestock grazing per-

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been three times, that hardly makes me an expert on the area, but each time that I have visited the area I have been greatly moved by the power of the natural prairie landscape, the sense of limitless horizon, the space. The subtle Great Plains beauty is unique in Bitter Creek which is not to be found in the same way for any of the other presently-designated wilderness areas, and I have been in all fifteen designated wilderness areas in Montana extensively.

Most of the wilderness study area meets and far exceeds the criteria for wilderness as defined in the 1964 Wilderness Act. There are indeed some portions of the wilderness study area that do not meet these criteria. The decision originally by the BLM to maintain and--and designate Bitter Creek as a wilderness study area was in fact based upon this fact--the fact that the area does meet in large part, at least, the criteria for wilderness defined by Congress.

The stark, eroded badlands of the Bitter Creek country and the fact that much of the area is eroded, basin-type country surrounded by higher bench lands provides the visitor with an awesome sense of solitude and with truly outstanding opportunities for primitive and unconfined recreation in the form of hunting and hiking and other forms of outdoor recreation.

I believe in reviewing the Environmental Impact Statement that the document greatly underestimates the

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and outcropping Bitter Creek as wilderness. The assumption is made in the EIS that there would be decreased use because of less vehicular access. I believe this assumption is without foundation. In fact, a large wilderness in Northern Montana, which is a part of our state which presently has almost no protected wilderness, I believe Medicine Lake being the only one, this would be a major attraction over time for the local economy.

For example, I can envision the possibility of horse outfitters becoming established in the area who could provide guided hunting trips into a prairie wilderness, a totally unique high-quality hunting opportunity that's virtually non-existent in the Northern Great Plains.

We have all heard, of course, of how important the guiding, outfitting and horse-packing industries are in places such as the Bob Marshall. Some of these economic opportunities should also be made available to that part of--to the north-eastern part of Montana.

The greatest long-term value, however, of a Bitter Creek Wilderness is not necessarily recreation, because recreation, after all, is a human use of wilderness. It's an important use, but wilderness has a--should exist in some places for its own values. The best reason for a Bitter Creek Wilderness is to improve the eco system representation in a

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There is only one example of a grass-wheat grass-

needle grass eco type within the wilderness system, the U. L. Bend, administered by the Fish and Wildlife Service, and already that area has had a rather severe boundary modification and accommodating a road as a result of recent legislation, and certainly the U. L. Bend is not as good an area as Bitter Creek to achieve this type of representation.

Despite a statement to the contrary on Page 36 of the EIS, the eco system factor should weigh heavily in determining the suitability of Bitter Creek for wilderness classification.

Another point in favor of at least some wilderness management in Bitter Creek is for the protection of important wildlife habitat. Obviously, the area is of importance for mule deer, for a large number of mule deer. Also the possibility does exist, according to the EIS and according to wildlife people that I talked to, that there could be habitat occupied by the endangered gray wolf, a species literally on the brink of extinction.

Now, it may be that there are no such animals, in the area, and it may be that there are, and I think that no one can say for sure. Given this uncertainty, we should proceed with extreme caution and ensure that the area is managed in a manner compatible with the maintenance and ultimate recovery of this population.

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Then--another important factor favoring a Bitter Creek Wilderness is the need to achieve a better geographical distribution of protected wilderness so that Eastern Montanans don't have to drive all the way to the Bob Marshall, 800 to a thousand miles round trip, to escape the mechanized world in a wilderness setting. A Bitter Creek Wilderness would go a long way towards correcting this geographical imbalance which presently exists.

Although the entire wilderness study area is technically qualified or much of it. I should say, is technically qualified for wilderness designation, the Montana Wilderness Association would like to see a balance between the competing uses and the competing perspectives between the no-wilderness and the all-wilderness extremes. I believe both options represent an extreme situation. As such, we support and urge the BLM to recommend the Bitter Creek East Alternative No. 3 for a 39,950-acre Bitter Creek Wilderness. This option is completely defensible from a wilderness suitability standpoint. The opportunity to preserve a small remnant of a once vast prairie wilderness far outweighs whatever temporary disruption of ORV uses and speculative natural gas potential that might occur in the area.

The alleged ranch-related economic impacts are exaggerated and are inconsistent with the grazing guidelines referred to previously.

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The Bitter Creek East Alternative would achieve the balance, the long-term balance, that Congress had in mind when Section 603 of FLPMA was enacted.

I must take exception as well in the Environmental Impact Statement to the incorrect contrasting of wilderness with multiple use. The wilderness management is an important part of multiple use. It's recognized in the Multiple Use Act as being part of the multiple-use concept and, in fact, in this particular area all forms of multiple use presently existing would continue. That is recreation, watershed protection, livestock production and wildlife. Those basic multiple-use values and uses presently occurring would continue under wilderness management of the reduced portion of Bitter Creek that I referred to as Alternative 3.

It seems to me that the BLM should regard a positive Bitter Creek Wilderness recommendation as an opportunity to better inform the local people of the benefits of wilderness designation and of the obligation that we as a society have to preserve at least a small part of our disappearing prairie wilderness for future generations.

I have appreciated the opportunity to present this statement and I will leave a copy with you for the official record.

MR. RUSSELL: Thank you, Stuart Doggett.

MR. DOGGETT: My name is Stuart Doggett, and I am

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planned it was this testimony is behalf of the Montana  
Linkingtowners Association, Montana Public Lands Council and the  
Montana Association of State Grazing Districts.

Our organizations are supporting a non-wilderness  
designation for the Bitter Creek area and, therefore, agree  
with the BLM's proposed action for this area. We feel the  
multiple-use management currently being used on the Bitter  
Creek area is working well and should be continued, and nowhere  
have we found a rational explanation as to why this area should  
be considered for a wilderness designation.

We do not support a wilderness designation for the  
Bitter Creek area for the following reasons: One, it would  
not enhance grazing capacities in the area and may, in fact,  
work against operators who graze in the area.

Two, currently there are allotment management plans  
in the Bitter Creek area, and with a wilderness designation  
they could be modified or altered.

Three, future control on noxious weeds might not be  
sufficient if the area were designated as wilderness.

Four, e.g. lending institutions have showed that they  
place a lower value on ranching operations which contain  
wilderness as described on Page 26 of the EIS.

Five, wilderness would mean a restriction on  
mechanical range developments in the area.

In conclusion, I would like to reiterate that our

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long term! I can say at least in a common-sense way that there  
is nothing that's going to change. You can hunt there. The  
relationships between the agricultural people, the recreation-  
ists, the tourists, the people that live in town, are all  
pleasant now, and I would assume in the long range without  
this designation they will continue to remain the same, but  
the second part of that, and I think it's one that I will get  
back to again, is the need to maintain this quality of life.

We are always talking about quality of life in this  
state, and in that area they have a terrific quality of life.  
As I said before, they have a good sense of harmony. Now, this  
is probably a little bit too broad based for this kind of a  
study, but they really do get along with each other up there.  
The agriculturalists know each other. The people in town know  
each other. I know there is an incredible infusion of hunters  
and some fishermen, and they are able to maintain themselves  
very well. There is nothing--so I think there is need to  
maintain that.

To impose upon these people in this region again a  
wilderness area that is for outside or external causes I think  
is a genuine mistake.

The second reason, and I have participated in a  
myriad of regulatory processes in my life, and we are here  
tonight participating in, basically, a regulatory process to  
make a determination on wilderness. You in this process have

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agreed that we do not support a wilderness designation for the  
Bitter Creek area and we feel that it would benefit more people  
if the current multiple-use management procedures were con-  
tinued. Again, I would like to thank this--the BLM for these  
hearings and hope that the concerns of our three organizations  
are taken into account when you decide how to manage the Bitter  
Creek area.

MR. RUSSELL: Thank you, Mr. Daggett,  
James Hodge.

MR. HODGE: My name is Jim Hodge. I live in Helena,  
and I am representing myself here tonight. I appreciate the  
opportunity to testify.

This area that's under question is an area that I  
have known and known pretty well for about thirteen years. I  
have hunted there. I have been--I have worked up in that  
country and I know an awful lot of the people up there.

I think there are three reasons that support your  
recommendation of no wilderness in that area. First of all,  
need; secondly, the regulatory process; and, third, public  
sentiment.

I think the question of need in my mind is twofold--  
one, the obvious one of is this needed? What happens if we do  
designate this a wilderness area that's not happening now?  
And that falls into three categories. What happens immedi-  
ately, what happens in the mid term and what happens in the

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made a determination that this shouldn't be a wilderness area,  
and I think that this is a good example, as was indicated  
earlier, where the process works. It's certainly an elaborate,  
comprehensive process, and I think you have made the determina-  
tion and made the recommendation, and I think that when you  
go--have that kind of process you should definitely be  
responsive to it.

The third one, and I think it's an incredibly  
important one, if you have--if everything was equal, and I  
think in this instance everything is not equal, in other words,  
there is no demonstrated need, that your regulatory process  
indicates that this shouldn't be a wilderness area, but even  
if everything was equal I think the public sentiment should be  
taken into account in this region.

I know of three instances, two in my history in the  
area and one that happened before, where there has been incred-  
ible outside bureaucratic intrusion on this area and these  
people. Fort Peck Dam, good or bad, I don't know, but it was  
an incredible intrusion. The Air Force Base is something that  
came down on these people like a ton of bricks--still there,  
still an incredible problem. I know that they have had  
ongoing range and grazing problems up there, so I think that  
in this instance to impose something from outside on these  
people is--in my view is a real mistake, and I think that if,  
in fact, you go against your recommendation and this was named

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1 a wilderness area I think it would be a good idea to have.  
2 I think if there is ever an instance where something is not--if  
3 something's not broken you shouldn't fix it, and at least in my  
4 time, in my tenure participating in that area, there is nothing  
5 broken up there. Everything can happen there that would  
6 happen if it was a wilderness area.

7 Thank you.

8 MR. RUSSELL: Thank you.

9 VOICE: Good speech there. Right there.

10 MR. RUSSELL: Mr. Stults.

11 MR. STULTS: My name is John Stults. I am from

12 Helena, and I would like to speak in favor of making the Bitter  
13 Creek area a wilderness area, and my feeling is that there is  
14 a need and that the need is to maintain a certain amount of  
15 prairie wilderness as laboratory for use in maintaining the  
16 ability of Montanans and Montana industry to reclaim.

17 I feel that we are putting more and more pressure on  
18 our prairie lands through industry and through agriculture,  
19 and we are finding that in both areas we have caused problems  
20 with natural, pardon me, natural grasslands and that our  
21 ability to reclaim is pretty hit and miss. It's a young  
22 science, and I think it needs a base of information to study  
23 and a base of information to expand its ability to successfully  
24 reclaim areas that we are strip mining and areas that are  
25 becoming victims of saline seep and other unfortunate circum-

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1 MR. ROMERO: I don't know too many people, but how  
2 many people have really been up there? Anybody?

3 VOICE: I have been up there.

4 MR. ROMERO: You guys have. How many? Well, you  
5 have been up there three times. That ain't nothing, you know,  
6 but cattle--cattlemen need water. They need grazing land.  
7 They don't need nobody from out of town coming in to tell them  
8 what to do. I am serious.

9 I raise my--I raise horses now, and I raise my  
10 garden, and I don't want nobody coming in and telling me what  
11 to do and what--you know, it's bullshit, excuse my language,  
12 but who needs it? You guys don't want nobody coming in telling  
13 you what to do. Do you? You let anybody in your house to come  
14 in and tell you what to do?

15 You had the biggest speech. Do you want somebody  
16 coming in your house and telling you what to do? No, no way.  
17 Why don't you guys get off this trip and let them people--we  
18 are talking about--you have been talking about locals. Let  
19 the local people do what they want to do and get off of it.  
20 They don't need it. They need all the land they can get.

21 You know, as far as that goes, I am Indian. My last  
22 name's Romero, but my real name is ANNE. I am from Turtle  
23 Mountain. You know, if there is a bitch going on I should  
24 bitch. I don't have no bitch, you know, and I can go on and on  
25 and on, but I don't want to. You guys can give me--you know,

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1 think that it's a good idea that we maintain some BW wilderness  
2 in the prairie lands that we can have a scientific base to work  
3 from and establish a good, solid and strong reclamation pro-  
4 cess.

5 Thank you for the opportunity.

6 MR. RUSSELL: Thank you, Mr. Stults.

7 Mr. Westburg.

8 MR. WESTBURG: I am Milo Westburg. I am from  
9 Helena here, and I am also from Lewistown, and my grandfolks  
10 and stuff homesteaded in the Missouri River Breaks, and also  
11 I have got a lot of in-laws and stuff around Glasgow, and I do  
12 support BLM's plan.

13 I think there is enough wilderness areas in the State  
14 of Montana, and I think we ought to start taking a look at  
15 local industry and we ought to start supporting some of the  
16 ranches and stuff as far as, you know, what they are trying to  
17 do.

18 If people want to take a look at wilderness areas,  
19 utilize those areas, they ought to use the ones that are  
20 existing and we ought to start taking a look at eliminating  
21 wilderness areas around the state.

22 Thank you.

23 MR. RUSSELL: Thank you, Mr. Westburg.

24 Mr. Romero.

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1 inside I am sad because bureaucracy sucks, and I am sorry, but  
2 that's the way it is. Just let the people up there take care  
3 of their stuff and you guys take care of your stuff.

4 I am looking directly at you because you made the  
5 best speech which is--you know, doesn't--doesn't hurt. It  
6 should, but it doesn't. You know, farmers need what they can  
7 get. Ranchers need what they can get. Nobody is getting that  
8 because somebody else is deciding what they are going to get,  
9 you know.

10 Who goes up there? Nobody. That's prairie. That's  
11 for the ranchers and that's for the farmers. Let them have it.

12 And that's about all I got to say. I could go on and  
13 on and on and--excuse me. Thank you. Thank you all.

14 MR. RUSSELL: Thank you, Mr. Romero.

15 Are there any other comments?

16 MR. TEIGEN: I am Mrs. Teigen. I am from Helena,  
17 Montana. I am appearing here on my own behalf. I am a third-  
18 generation Montanan. Our family is still operating a ranch  
19 that's a hundred years old this year quite a few miles south  
20 of the Bitter Creek area.

21 I have not been on the Bitter Creek Wilderness  
22 Proposal. I have flown over it a time or two. I have a rough  
23 idea of what it looks like.

24 I think that it's not often that I wholeheartedly  
25 agreed with the Bureau of Land Management on any of their

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1 I think the  
2 have--they have recognized the situation as it is and I am  
3 pleasantly surprised to see that the--that the Bureau recog-  
4 nizes the situation.

5 You know, we get the idea that this wilderness is a  
6 new thing that's just started in the last few years, that  
7 Montana has to get their share of wilderness before it's all  
8 gone. I got news for some of you folks. We have had--  
9 Montana's had 3.3 million acres of wilderness for a hell of a  
10 long time and this has been available for many, many people to  
11 enjoy.

12 Much of the state that we are so concerned about and  
13 want to preserve is being preserved today because of the  
14 ranching industry has been able to do that. You start turning  
15 these ranchers into a bunch of ticket takers, people requiring  
16 access permits to get on there, they have to have a certain  
17 kind of an arrangement to bring their pack string on there if  
18 they are going to bring a pack string on there, and so on, you  
19 are going to have a great deal more solitude out there than you  
20 have right now.

21 I think agriculture, particularly the livestock  
22 industry, is in a bad way today. They can't stand too much  
23 more of this. We deplore the idea of--idea of subdivisions  
24 and operators from the East and corporate individuals coming  
25 out and buying into our--our range lands. The tougher you make

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1 to that outfit, but I think the BLM has made a good decision  
2 here, and I hope to God you stay with it.

3 Thank you.

4 MR. RUSSELL: Thank you, Mr. Teigen.

5 Are there any others?

6 Okay. In closing the record I would like to remind  
7 you that the testimony received at this hearing will be avail-  
8 able in the form of a transcript and if you wish to receive  
9 copies of the transcripts please leave your name and address  
10 with the court reporter.

11 You are also--just a minute.

12 VOICE: I forgot inserting that letter in support  
13 of Alternative 1 for the hearing record. I wonder if I may do  
14 so at this time.

15 MR. RUSSELL: Yes, sir. I will accept it. Thank you.

16 You are also reminded that all testimony will be  
17 analyzed by the Lewistown District Manager and a written record  
18 of that analysis will be prepared and will be available for  
19 inspection at the Lewistown District Office. The analysis of  
20 this testimony will be used to determine what changes, if any,  
21 are required in the wilderness suitability recommendations.

22 The final recommendations will be forwarded to the  
23 President following concurrence and signature by the Secretary  
24 of the Interior.

25 This hearing is closed. This is the last hearing

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1 I think I see and I think that this is a real problem  
2 that is going to happen. If you want to deal with the  
3 easterners that come out and hang the no-trespassing signs up,  
4 then--then--all the other access problems, just keep hassling the  
5 bona fide ranchers and farmers.

6 The reason that area looks as good as it does today  
7 is because they have taken care of it.

8 I think that there is another problem that you ought  
9 to give some thought to in this area. We talk about that this  
10 is an area, I think, according to the definition, it's an area  
11 untrammelled by man, and so on. Well, my information about the  
12 Bitter Creek area was it was plowed one time, there were people  
13 living on that area, there were school bells ringing, there  
14 were a lot of things going on out there, and now by some stretch  
15 of the imagination because the folks moved out in order to make  
16 an economic unit for somebody else all of a sudden we have got  
17 to preserve this thing and save it--save us from ourselves.

18 I think the ranchers and farmers in this country are  
19 able to take care of themselves very well and I am glad to see  
20 that the Bureau of Land Management has recognized this. The  
21 local people are against this. The major livestock organiza-  
22 tions and agricultural organizations are against this. The  
23 only people that I know that are for it are the wilderness  
24 society and I don't know where they come from. I have never  
25 heard the numbers or the names of the individuals that belong

RAUCH SHORTHAND REPORTING  
505 N. 1ST ST.  
HELENA, MONT. 59601  
505-263-1111

32

1 that has been scheduled. However, the record shall remain  
2 open until July 20, 1964, and we urge that you contact those  
3 who could not make it to this hearing or the hearing that was  
4 in Glasgow two nights ago and have them submit any written  
5 comments that they might wish to make.

6 The BLMers will stay a while to answer any questions  
7 that anybody has concerning the document itself for clarification  
8 or for whatever reason, and with that I will close the  
9 hearing, and I appreciate you all coming and taking an interest  
10 in this.

11 Thank you.

12 (The hearing was then concluded at the hour of  
13 8:30 p.m., this 24th day of May, 1964.)

14 I, Harry C. Rauch, a Certified Shorthand Reporter  
15 and Registered Professional Reporter, do hereby certify that I  
16 took down in stenotype the proceedings had on the subject  
17 Hearing at the time and place hereinbefore set forth and that  
18 the foregoing thirty-two (32) pages constitute a full, true and  
19 correct transcript of my stenotype notes of said proceedings.

20 Dated this 11th day of June, 1964.

21 Certified Shorthand Reporter  
22 and  
23 Registered Professional Reporter

RAUCH SHORTHAND REPORTING  
505 N. 1ST ST.  
HELENA, MONT. 59601  
505-263-1111

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

1860 LINCOLN STREET

DENVER, COLORADO 80295-0691

JUN 29 1984

Ref: 8MD

Mr. Glenn W. Freeman  
District Manager  
Bureau of Land Management  
Airport Road  
Lewistown, Montana 59475

Dear Mr. Freeman:

The U.S. Environmental Protection Agency (EPA) has completed its review of your agency's draft environmental impact statement (DEIS) on the Bitter Creek Wilderness proposal. The DEIS is well written, informative and adequately covers the environmental issues involved.

Our only comment concerns the apparent severe over-grazing situation on parts of the BLM lands. The DEIS states that certain range improvements are necessary to correct these problems. No mention is made, however, of a range improvement alternative based on lowering the number of livestock using these over-grazed areas. This alternative should also be analyzed and discussed.

According to EPA's rating system for draft impact statements this DEIS is rated LD-2 (lack of objections - insufficient information). The Agency needs information to analyze the feasibility of the lowering numbers of livestock.

If you have any questions, please contact Mr. Gene Taylor in our Montana Office in Helena, at 449-5486.

Sincerely yours,

Jack W. Hoffman  
Acting Assistant Regional Administrator  
for Policy and Management

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| ASSOC. DIR.     | PA         |
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2



## DEPARTMENT OF HEALTH AND HUMAN SERVICES

Public Health Service

Centers for Disease Control  
Atlanta GA 30333

July 5, 1984

Mr. Glenn W. Freeman  
District Manager, District Office  
BLM, Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

We have reviewed the Draft Wilderness Environmental Impact Statement (EIS) for Bittercreek Wilderness Study Area, Montana. We are responding on behalf of the U.S. Public Health service.

In Chapter 3 (Affected Environment) a description of mining location and leasing states that "in the case of post-FLPMA leases, any exploration or development must not degrade wilderness value in the Wilderness Study Area (WSA)." It would be helpful in the Final EIS to describe the process of evaluating potential activities to determine if degradation of wilderness value would occur in the study area.

We have reviewed this document for potential health effects and have no other comments to offer. We believe that the proposed alternatives have been adequately addressed.

Thank you for the opportunity to review this Draft EIS. Please send us a copy of the final document when it becomes available.

Sincerely yours,

Stephen Margolis, Ph.D.  
Chief, Environmental Affairs Group  
Environmental Health Services Division  
Center for Environmental Health

3



United States Department of the Interior  
NATIONAL PARK SERVICE  
ROCKY MOUNTAIN REGIONAL OFFICE  
655 Parker Street  
P.O. Box 25387  
Denver, Colorado 80225

IN REPLY REFER TO:

L7619 (RMR-PC)

JUN 2 7 1984

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Memorandum

To: District Manager, Lewistown District, Bureau of Land Management,  
Lewistown, Montana

From: Associate Regional Director, Planning and Resource Preservation,  
Rocky Mountain Region

Subject: Review of Bitter Creek Wilderness Draft Environmental Impact  
Statement (DES-84/17)

The National Park Service has reviewed the subject document. None of the alternatives discussed will affect any area where the National Park Service has jurisdiction, expertise or management responsibilities.

*Robert A. Strelt*  
for Richard A. Strelt

4



MONTANA HISTORICAL SOCIETY  
HISTORIC PRESERVATION OFFICE

225 NORTH ROBERTS STREET • (406) 444-4584 • HELENA, MONTANA 59620

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May 21, 1984

Glenn V. Freeman, District Manager  
District Office  
Bureau of Land Management  
Airport Road  
Lewistown, MT 59457

RE: Draft Bitter Creek Wilderness Environmental Impact Statement

Dear Mr. Freeman:

Thank you for the opportunity to comment on the document identified above. I do not believe that we have substantial comments to offer to you. As a general rule, wilderness designation affords historic and prehistoric resources some greater protection than does multiple-use designation. However, so long as you are committed to compliance with 36CFR800 in the completion of projects in that area, cultural resources should receive consistent identification and through evaluation and consideration in planning. Hence, we do not believe that cultural resources management issues need to be instrumental in the choice of an alternative for the Bitter Creek Area.

Sincerely,

*Marcella Sherfy*  
Marcella Sherfy,  
State Historic Preservation Office  
cc: Ralph Driener



5

# Valley County Board of County Commissioners

P.O. BOX 111  
GLASGOW, MONTANA 59230



April 23, 1984

Mr. Dennis Hoyum  
Bureau of Land Management  
Rte. 1 - 775  
Glasgow, Montana 59230

Dear Mr. Hoyum:

The Board of County Commissioners would like to reaffirm our previous stand that the Bitter Creek area should not be designated a wilderness as it would not be in the best interest of Valley County and the proposal should be abandoned. We feel the Multiple Use Concept of these federally owned lands be maintained for the benefit of all, for the reasons we stated in our letter of August 11, 1983, and from the report by Dr. John E. Taylor, Range Consultant from Montana State University.

We also fully support the decision by the Bureau of Land Management to not designate the Bitter Creek area as a wilderness.

Very truly yours,

*Earl Daley*  
Earl Daley, Chairman  
Board of County Commissioners

ED/mle/dw

cc: William Clark -Secretary of the Interior  
Bob Burford -Director, Dept. of the Interior  
Mike Penfold -State Director, Bureau of Land Management  
Glen Freeman -Manager, Bureau of Land Management ✓

Earl Daley, Chairman  
Howard Cornwell  
John Engstrom  
Mary Lou Ride, Clerk

Telephone  
(406) 225-0118

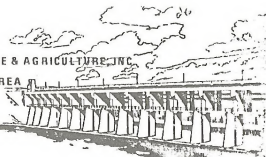
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6

# CHAMBER OF COMMERCE & AGRICULTURE, INC. Glasgow AREA

BOX 837 GLASGOW, MONTANA 59230

TELEPHONE (406) 228 2222



April 23, 1984

Glenn W. Freeman, District Manager  
District Office BLM  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

It is with great pleasure that I write this letter as requested by the Glasgow Chamber of Commerce and Agriculture's Board of Directors. The Board, at last regular scheduled meeting, went on record favoring the BLM's decision to recommend a "NO WILDERNESS", designation for the Bitter Creek Area.

As you are no doubt well aware, our Chambers very vocal protests at placing the Bitter Creek Area into Wilderness designation, have been representative of the majority of citizens in Valley County.

We are thankful and appreciative of this BLM action, and with these remarks we wish to indicate to you and the Bureau our pleasure that the Public and Government can work together.

Sincerely,

*Glenn A. Miller*  
Glenn A. Miller  
Executive Vice President

GH/jh



ACCREDITED  
MEMBER OF NATIONAL  
ASSOCIATION OF  
CHAMBERS OF COMMERCE

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7

# MONTANA PUBLIC LANDS COUNCIL

P. O. BOX 1679 — HELENA, MONTANA 59624

Phone (406) 442-3420

JAMES E. CLINTON ..... ALBANY ..... CHAIRMAN  
 ROBERT L. TIGHE ..... CHOCOMA ..... VICE CHAIRMAN  
 EDWARD W. DUFFY ..... HELENA ..... ASST. SECRETARY/TREASURER

July 18, 1984

Glenn Freeman  
 District Manager  
 Bureau of Land Management  
 Airport Road  
 Lewistown, Montana 59457

Dear Glenn,

The Montana Public Lands Council thanks you for the opportunity to comment on the draft Bitter Creek Wilderness Environmental Impact Statement. This Council represents the interest of livestock producers who use public lands in Montana and is directed by the Montana Stockgrowers Association, the Montana Wool Growers Association and the Montana Association of State Grazing Districts. Our comments therefore represent the Public Lands' position of these three entities in regards to the Bitter Creek Wilderness Environmental Impact Statement. Our comments follow:

As described in the Bitter Creek draft EIS, the Montana Public Lands Council endorses the No Wilderness Alternative and compliments the Bureau of Land Management for choosing this as their Proposed Action. Although we agree with your No Wilderness recommendation for the Bitter Creek area, we feel that we should clearly outline our reasons for not wanting a Wilderness designation in this area; they are as follows:

- 1) A Wilderness designation would result in less effective livestock management for the operators who utilize this area for grazing purposes. For example, operators who use motorized vehicles to occasionally monitor their livestock would have to abandon this logical practice and revert to more time consuming and expensive methods such as monitoring on foot or horseback.
- 2) Another reason that a Wilderness designation is not supported in the Bitter Creek area is that such a designation would go directly against the wishes of the individuals who live in or near the area. It is our feeling that the people who derive a living from this area and who must ultimately live with any decision made by the BLM should be given fair consideration. A Wilderness designation or even partial Wilderness designation of this area could create poor working relationships between permittees in the area and the BLM. Again, we compliment you for recognizing this problem in your draft and recommending an alternative that would avoid such conflicts.

|                  |              |
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| DIRECTIONS       |              |
| J. E. ANDERSON   | JACKSON      |
| JOHN F. BAUCUS   | WOLF CREEK   |
| W. J. BROWN, JR. | RAID SPRINGS |
| GARY ESTHART     | GLASSBORO    |
| JOE FOSTER       | GLASSBORO    |
| W. E. SHAWSON    | GLIN         |
| JOE RANNEY       | BRINER       |
| GEORGE RATH      | ROUNDUP      |

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Page 2

Glenn Freeman, BLM  
 July 18, 1984

- 3) We continue to feel that the multi-use concept is the best type of public land management in this area for all interests when you compare it to the limitations you encountered with a Wilderness designation. Domestic livestock and wildlife habitat would benefit most under multiple use management because rangeland developments and water improvements that are constructed for livestock would improve wildlife habitat.
- 4) A final point we would like to make in regards to the Bitter Creek draft and one that we would like to compliment the BLM on is for revealing the study that clearly shows public land permits included in Wilderness are not viewed favorably by Ag loaning institutions. Public land permits do have value in the process of borrowing money and with a Wilderness designation of an area containing grazing permits, these values would be reduced. As you point out in your draft, information was collected by the Agricultural Management and Economic Consulting through such Ag loan institutions as the Federal Land Bank, Farmers Home Administration and the Production Credit Association, which revealed that lenders would place a lower value for lending purposes on ranching operations containing wilderness.

For the reasons we have outlined, the Montana Public Lands Council would again like to emphasize that we support the Non Wilderness recommendation as described in the Bitter Creek Draft since we feel this decision represents the only logical alternative in deciding how this area should be managed. Again, we thank you for this opportunity to comment on this draft and we look forward to working with you in the future.

Sincerely,

*Jim Courtney*  
 Jim Courtney  
 Chairman

JCE:jr

CC: Senator Max Baucus  
 Senator John Melcher  
 Representative Ron Marlenee

DN \_\_\_\_\_ L & BR \_\_\_\_\_  
 ASSOC. DN \_\_\_\_\_ PA \_\_\_\_\_  
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## ELDERNESS SOCIETY

FOUNDED IN 1939

July 12, 1984

Glenn Freeman, District Manager  
RLM Lewistown District  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Fraeman,

Thank you for this opportunity to participate in the Bitter Creek wilderness designation process. The Wilderness Society support the Bitter Creek East alternative of 39,950 acres.

This compromise alternative provides for continued motorized recreational use with a reduction of less than 1% in the annual regional economy while maintain a harvest of trophy calibre mule deer and trophy size mountain goat. The area contains 1,050 AUMs on 1,300 acres of rangeland that could be mechanically treated; and, provides for game development on nearly 20,000 acres which would be released outright leaving a mere 8% of the wilderness designated as a BLM area. The area contains some of the lowest game densities of wilderness values on 67% of the USA, yet we recognize the importance of agreement by concession in this situation and believe that the Bitter Creek tract alternative is the most courteous concession to the BLM. Eastern wilderness values are put at the benefit of our national interest a portion of a once vast prairie wilderness. It is an irreplaceable remnant of our American heritage, and we believe that the BLM and the American people will find this alternative fair and characteristic over an irreversible and non-consensual use.

The Bitter Creek acornstand is, in the greatest part, in very fine ecological shape and meets all minimum requirements for wilderness designation under the Wilderness Preservation Act. It possesses crucial winter habitat for pronghorn antelope and important habitat for mule deer and many other wildlife species that can only be preserved by the wilderness designation. No potential or actual management conflicts or challenges are addressed in this EIS are not substantial enough to support a No Wilderness-Proposed Action alternative. Specifically:

a) Exchange or purchase options for state or

NORTHERN ROCKIES REGIONAL OFFICE  
413 WEST IDAHO STREET, SUITE #102, BOISE, IDAHO 83702

(200) 343-6153

Bitter Creek  
The Wilderness Society  
Page 2.

private inholdings were not addressed yet they are essential considerations for a self-protecting and manageable wilderness.

How to manage pre-FLPMA leases is a problem for many wilderness worthy BLM lands and one which has yet been solved. However, degradation of wilderness would depend upon the occurrence and manner of lease execution. I believe this problem must be addressed in greater depth and does not justify unsuitability classification of otherwise worthy lands. Furthermore, only 82 of the acres in the Bitter Creek East alternatives are under risk.

The speculation that mule deer herds might be degraded without motorized access for hunting and thus create a management problem is an inadequate rationale for non-wilderness. Should the herd quality change as predicted, that is there would be more older animals, and should that condition continue to be perceived as a problem, a variety of treatments could be implemented. Exploring long-term incentives and an examination of the desirability of a "young" herd were not adequately addressed,

The prairie character coupled with a number of highly unusual aspen groves add to the values that already qualify Bitter Creek for wilderness. Diversity within the National Wilderness Preservation System to include prairie wilderness is not adequately achieved by the UL Bend wilderness and the addition of Bitter Creek East would be both reasonable and desirable in terms of diversity. This alternative is a compromise that will protect a portion of one of our nation's last remaining natural Great Plains Shortgrass Prairie ecosystems.

Finally, Bitter Creek East possesses high wilderness suitability in the form of naturalness, outstanding solitude and primitive recreation. We urge you to recommend the Bitter Creek East wilderness alternative of 39,950 acres as the prudent and responsible course of action.

Sincerely,

Tom Robinson, Director  
Northern Rockies Region

9



# Wildlife Management Institute

Suite 725, 1101 14th Street, N.W., Washington, D.C. 20005 • 202/371-1908

DANIEL A. POOLE  
President  
1 R. JAHN  
Vice-President  
1 E. WILLIAMSON  
Secretary  
WILLIAM E. DIXON, Jr.  
Board Chairman

June 25, 1984

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Mr. Glenn W. Freeman  
District Manager  
Bureau of Land Management  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

The Wildlife Management Institute is pleased to comment on DRAFT BITTER CREEK WILDERNESS ENVIRONMENTAL IMPACT STATEMENT, Montana.

We prefer alternative ALL WILDERNESS. It is far superior to the preferred alternative NO WILDERNESS. Any over-populations of wildlife created can be handled easily by the state's hunting regulation system.

On page 1 under major environmental consequences, we wonder why it is superior to avoid impacts on livestock and minerals yet easy to completely eliminate wilderness? Particularly since grazing is the most wildlife-impacting use of western lands.

There is only one other grama-wheatgrass-needlegrass ecotype in the wilderness system, page 36. This is further reason to establish all wilderness. Short grass prairie is needed in the system. The statement that similar areas on the Charles Russell National Wildlife Refuge have been proposed means nothing. It is reminiscent of BLM attitudes on the old growth/spotted owl situations: "let other agencies carry the burden."

On page 9, the minor reductions in habitat management necessary are acceptable to obtain wilderness beneficial to wildlife on nearly 60,000 acres. No grazing cuts will be made. Page 10 reveals that 7,317 AUM are permitted now. Based on season of use, we compute that about 4,158 cows are involved in the study area (Table 3.1). The only change in livestock management would require that ranchers use horses in the old Montana traditions and lifestyle, not pickups in the new one.

Mr. Glenn W. Freeman

-2-

June 25, 1984

At a grazing fee of \$1.40 per AUM, the government receives only \$10,243 a year from grazing on the WSA. We wonder what the management costs are.

Since wilderness will not harm grazing and will benefit wildlife, we see no reason for anything other than selection of the all wilderness alternative. Enforcement of the wilderness is something that can be solved by good planning and custodial type patrols. It is not a major issue.

These remarks have been coordinated with William B. Morse, the Institute's Western Representative.

Sincerely,

*Daniel A. Poole*  
Daniel A. Poole  
President

DAP:mmm

10

## Valley County Development Council

Courthouse Annex, Room 2  
Post Office Box 822  
Glasgow, Montana 59220  
Tel: (406) 228-9380  
May 21, 1984

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Page 2

## "Bitter Creek" Statement

To: Mr. Glenn W. Freeman  
District Manager, District Office  
United States Department of the Interior  
Bureau of Land Management  
Airport Road  
Lewistown, Montana 59457

Subject: Bitter Creek Wilderness Environmental Impact Statement Draft.  
Formal Hearing for public comments, Glasgow, Montana  
May 22, 1984.

Presented By: The Valley County Development Council (VCDC)  
(This organization is designated Overall Economic Development  
Program Committee for Valley County in a coordinating capacity.  
The executive board is assembled with broad representative interests.)

Statement: On April 10, 1984, this Board, in regular scheduled meeting, reviewed the Draft Bitter Creek Wilderness EIS and were pleased with BLM's No. 1 recommendation for Proposed Action by "No Wilderness--no acreage would be recommended for wilderness designation." In action taken, the Board confirms in this recommendation of No Wilderness designation in the Bitter Creek area and further authorizes the VCDC director, Mannon Bailey, Jr., to present a statement at public hearing with additional information or reiteration of past testimony for this.

It is again recognized that in following through on the edit of the U. S. Congress to inventory and study public lands for wilderness values, the BLM personnel have extended considerable effort in research, analysis, decision, and compiling of these recommendations.

To those not of this area who will be reviewing the recommendations of this study, may the following points be considered.

- o A vast majority of the people of the prairie country are opposed to wilderness designation for the Bitter Creek.
- o It has a long history of use by man with a continual cooperative upgrading of the resources for multiple use to the benefit of the economy, recreation, wildlife, and the watershed; especially since the devastating drought of the 1930's when those who "homesteaded" were forced off the land which is by nature a semi-arid area in the best of years.

o Homesteaded lands: There was a large settlement of people on the lands of this general area. At the time of the drought of the 1930's and under the Land Utilization Act (LU), the federal government purchased many of the homesteaded lands which were later seeded to grass. Within the EIS on the Bitter Creek it shows some 8,000 acres of these once privately held and inhabited lands. However, research of the homestead plat books in the Valley County Museum shows that some 24,000 acres within these study boundaries were once homesteaded, giving names, date of filing, and number. This data surfaced when descendants of these pioneers wrote for information or came to see where this part of their ancestors lives took place. They are called "heritage" lands and should be readily available for viewing by those who seek them out. Wilderness designation would greatly curtail this. These lands no doubt reverted to the government for various reasons before the LU Act.

o Resource Management: Through the cooperative efforts of those who lease the lands for domestic livestock along with the BLM, Local Grazing Districts, Soil Conservation District, and associated federal agencies, Dept. of State Lands, State Fish and Game, and sportsmen's organizations, the resource have been improved with many crossfences including sophisticated rest rotation grazing, water development reservoirs, improved wildlife population, all of which needs availability for use and maintenance. These are well covered in EIS. To change this long established and working system to something, which at best, would be a very low profile wilderness area does not seem compatible with the interest of the public.

o Sustained Use by the Public: Use of public lands (by other than domestic livestock) would relate to the population of the area or the public from other areas would be drawn only for significant attractions. Two of Valley County's population peaks were during construction of Fort Peck Dam 50 years ago. There was no big game to hunt in eastern Montana at that time. More recently the large Air Force SAC Base was established 18 miles south east of the Bitter Creek. It was in operation from 1958 to 1968 and reached an on-base population of 8,000 people. This, along with the off-base population swell, gave the county an estimated peak population of 20,000 people (between official census years). The Opheim Air Force Radar Base operated for 28 years, 1951-1979. There were 115 personnel plus families. This was located near Opheim and some 12 miles from the nearest portion of the Bitter Creek EIS area. This period was also one of high mule deer

Keep Valley County Growing



Page 3

"Bitter Creek" Statement

and antelope populations on the prairies and received attention from the public. Valley County's 1980 population census was 10,280; the point being that the public lands did provide public recreational use with no evidence of sustained damage by a population which was twice the present size locally.

Many of these are in the EIS, but thank you for the opportunity to expand a few of the many reasons we feel this area is not qualified for Wilderness designation and agree with the No. 1 recommendation for no wilderness on the Bitter Creek.

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# MONTANA WILDERNESS ASSOCIATION

STATEMENT IN SUPPORT OF A BITTER CREEK WILDERNESS PRESENTED AT A BLM HEARING IN HELENA, MONTANA ON MAY 24, 1984--PRELIMINARY COMMENTS OF THE DRAFT BITTER CREEK WILDERNESS EIS DATED MARCH, 1984

submitted by Bill Cunningham, MMA Conservation Director

I first want to express my gratitude to the BLM for conducting this important public hearing concerning the future of the Bitter Creek WSA in Helena. A hearing in Helena--some 600 miles from Bitter Creek--is at least tacit recognition of the fact that the Bitter Creek wildland resources are of more than just local significance. Indeed, the potential Bitter Creek Wilderness is a resource of state and even National importance.

Unfortunately, the draft statement and recommendation for No Wilderness in any portion of the Bitter Creek WSA fails to recognize this broader, long-term significance. I am surprised and deeply disappointed that the BLM has chosen failed to make a positive Wilderness recommendation for this special roadless area and I can only surmise that local pressures unduly influenced this negative proposal.

I should state at the outset that I am personally familiar with the Bitter Creek WSA and I can personally attest to its wilderness suitability. On March 12, 1980 when I was a Regional Representative for The Wilderness Society I took an extensive aerial tour of the Bitter Creek WSA along with an on-the-ground tour into the center of the area. The purpose of the tour was to make recommendations to the BLM as to the routing of the Northern Border Gas Pipeline. My recommendations were based on the principles of utilizing existing utility corridors and maintaining the wilderness integrity of the WSA. I am enclosing a copy of my March 14, 1980 letter to former Montana State Director Penfold outlining these recommendations. The point I wish to make is that we cooperated in good faith with the BLM and industry to accommodate development while protecting a vital part of our Wilderness heritage.

As a result, I feel especially let down by the BLM No Wilderness recommendation for Bitter Creek. I am particularly puzzled given the strength of the Bureau's resolve to keep the area in WSA status despite the bitter opposition from certain local interests to any wilderness consideration for Bitter Creek.

In June, 1980 I led an MMA Wilderness Walk into the Bitter Creek WSA. We conducted a 10-mile hike through the eastern portion of the area with local townspeople on both sides of the issue. We had a good open discussion of the wilderness characteristics of the area, grazing in wilderness as well as of the issue of wilderness preservation in general. I feel that we helped clear up a number of anti-wilderness myths. For example, the local folks learned that not only is livestock grazing permitted within Wilderness but also, that there have never been any reductions in grazing in Wilderness because of Wilderness designation. They learned too that we as conservationists support the continuation of grazing in Wilderness and that we support the grazing guidelines from the Idaho and Colorado Wilderness legislation which allow, among other things, the maintenance and improvements of grazing facilities within Wilderness as well as the occasional use of motorized equipment in Wilderness by the permittee when necessary for administration of the allotment.

In view of these guidelines, and their incorporation within BLM Wilderness Management policy, I don't see why livestock interests would oppose wilderness in this area. Wilderness is the only form of federal land classification with a statutory guarantee that livestock grazing shall continue in Wilderness where it existed at the

## STATEMENT IN SUPPORT OF A BITTER CREEK WILDERNESS PAGE TWO--May 24, 1984

time of designation of the area (sec. 4(d)4 of the Wilderness Act of 1964).

Each time that I've visited Bitter Creek I've been greatly moved by the power of the natural prairie landscape. The sense of limitless horizon, space and subtle Great Plains beauty is unique in Bitter Creek; not to be found in the same way in any other presently designated Wilderness. Most of the WSA meets and far exceeds the criteria for Wilderness as defined in the 1964 Wilderness Act. Certainly the BLM decision to maintain Bitter Creek in WSA status was based upon this fact.

The stark, eroded badlands of the Bitter Creek country and the fact that much of the area is an eroded bench surrounded by higher benchlands provides the visitor with an awesome sense of solitude and with truly outstanding opportunities for primitive and unconfined recreation.

The EIS greatly underestimates the economic value to the tourism industry of designating, managing and protecting Bitter Creek as Wilderness. The assumption of decreased use because of less vehicular access is without foundation. In fact, a large Wilderness in NE Montana (which presently has almost no protected wild country) would be a major attraction over time. For example, horse outfitters could conduct guided hunting trips into a prairie wilderness--a unique, high-quality hunting opportunity virtually non-existent in the Northern Great Plains.

However, the greatest long-term value of a Bitter Creek Wilderness is not recreation although this will become an increasingly important use bringing new dollars into the local area. The best reason for a Bitter Creek Wilderness is to improve the ecosystem representation in the NWFS. There is only one example of a grass-vegetation needlegrass ecotype within the Wilderness System (UL Bend) and this area is not as good a representation as Bitter Creek. Despite a statement to the contrary on page 36 of the EIS this factor should weigh heavily in determining the suitability of the Bitter Creek WSA for Wilderness classification.

Another important factor favoring a Bitter Creek Wilderness is to need to achieve a better geographical distribution of protected Wilderness no that eastern Montanans don't have to drive all the way to the Bob Marshall (800 to a 1000 miles round trip) to escape the mechanized world in a wilderness setting. A Bitter Creek Wilderness would go a long way toward correcting this geographical imbalance.

Whether Bitter Creek receives Wilderness protection or not we would question the economic and environmental soundness of the proposed mechanical treatment (chiseling) on the native rangeland.

Although the entire WSA is technically qualified for Wilderness designation the WSA would like to see a balance between the competing uses and perspectives between the "No Wilderness" and "All Wilderness" options. As such, we support and urge the BLM to recommend the Bitter Creek East Alternative #3 for 39,950 acre Bitter Creek Wilderness. This option is completely defensible from a wilderness suitability standpoint. The opportunity to preserve a small remnant of a once vast prairie wilderness far outweighs whatever temporary disruption of OHV uses and speculative natural gas potential that might occur in the area. The alleged ranch related economic impacts are exaggerated and inconsistent with the grazing guidelines. In sum, the Bitter Creek East Alternative would achieve the balance the long-term balance that Congress held in mind when section 603 of FLPMA was enacted.

Instead of incorrectly contrasting Wilderness with "Multiple Use" (as done in the EIS) the BLM should regard a positive Bitter Creek Wilderness recommendation as an opportunity to better inform local people on the benefits of Wilderness and the obligation that we have as a society to preserve at least some of our diminishing prairie wilderness for future generations.

Thank you for the opportunity to present this statement. I may submit a more detailed statement for the record before the July 20, 1984 hearing. In the meantime, please keep me closely advised on your final recommendation as it evolves and on any other factor that may affect the wilderness suitability of Bitter Creek.

P.O. Box 635 • Helena, Montana 59624 • (406) 443-7350



# The Wilderness Society

107 West Lawrence, Helena, Montana 59601 (406) 443-7350  
Mail to: P.O. Box 1184

March 14, 1981

Mike Ivofield  
State Director  
Bureau of Land Management  
P.O. Box 10157  
Billings, Montana 59107

Dear Mike:

On March 12 I took an extensive aerial tour of the proposed Bitter Creek Wilderness Study Area (WSA) along with a brief ground trip into the center of the unit. As a result of this tour I've gained a valuable personal feeling about the area. In the process I've made a careful analysis of the Northern Border Gas Pipeline routing question.

I will share with you my major conclusions:

(1) Bitter Creek is exceptionally well suited for wilderness study. I am perhaps most impressed with the incredible diversity of landforms and ecosystems within the area: superb shortgrass prairie, rugged broken and badlands, high plateaus and broad valley bottomlands. Although I was in the unit for only a short time I experienced a feeling of space, solitude and timelessness similar to being atop the Thoreau Wall in the middle of the Bob Marshall Wilderness. It's impossible to adequately describe this feeling but suffice it to say that Bitter Creek is undoubtedly a small natural remnant of the northwestern Plains and a priceless piece of our Nation's wilderness heritage.

(2) As best as I could determine from the air, the "roads" which divide the revised WSA proposal into three parts are in fact roads within the definition of the BLM wilderness review guidelines. The use of these roads in seasonal fire and grazing and other major portions of them could easily be returned to a natural condition.

(3) The present subdivision of the Bitter Creek WSA into three major components along with the deletion of several peripheral portions appears to be justifiable due to heavy on-site intrusions within the deleted areas.

(4) The Wilderness Society is firm in its position that the presently existing wilderness potential of Bitter Creek must not be seriously compromised by the Northern Border Gas Pipeline. As such, the original preferred route of the pipeline company for a corridor approximately two miles north of the east-west road is completely unacceptable. This corridor would bisect the roadless portion of the largest component of the WSA. In this corridor the pipeline would traverse some extremely rugged terrain in the eastern part of the study area thereby causing substantial environmental impact.

(5) After an aerial tour and assessment of the proposed pipeline corridor along the east-west road it is my conclusion that the Bitter Creek WSA would not be seriously compromised if the pipeline is carefully routed within the visual impact zone of the existing road. The pipeline should be located as close to the road as possible and strict construction and reclamation standards should be enforced.

"In wildness is the preservation of the world." - Thoreau

ALL INFORMATION CONTAINED HEREIN IS UNCLASSIFIED  
DATE 02-08-2001 BY 60322 UCBAW

page two

(6) The already impacted road corridor within the Bitter Creek WSA should be strictly adhered to. In particular, I am fully aware of the question with regard to the eastern end of the road corridor. The roadbed draw bends sharply to the right as it climbs up to the rim. From an engineering standpoint it would be easier to route the pipeline straight up a side wash immediately south of the road corridor. This would cut off approximately 15-20 acres from the WSA with a resultant visual impact on a somewhat larger area. We flew over this contested segment a number of times and without question the curve in the eastern part of the creek bottom is tight with little space in which to operate.

However, I feel strongly that the already impacted road corridor should be utilized in even this fairly difficult section for the following reasons:

a) The interim management policy for WSA's and the integrity of the Bitter Creek WSA itself has already been stretched to the limit (and perhaps beyond) by allowing the pipeline to traverse the study area along the road. I would be far more comfortable if the pipeline were routed around rather than through the WSA. However, in the spirit of compromise, careful routing along an already impacted corridor can be acceptable so long as we don't begin expanding the zone of impact into undeveloped portions of the WSA in the name of convenience or company preference.

b) If the pipeline is allowed to deviate even slightly from the impacted road corridor a serious adverse precedent would be established that would undermine the entire BLM wilderness review process. The "Bitter Creek example" would be cited by any party seeking to conduct an otherwise prohibited activity within a BLM WSA.

c) The question becomes "where do you draw the line?" If BLM caves in on this one then what will the next exception be? The pipeline routing issue in the eastern segment of the road corridor, minor as it may appear on the surface, literally goes to the heart of BLM's commitment to properly implement the interim management policy for WSA's in the face of outside pressure.

d) Two vitally important principles are at stake: the concept of utilizing existing corridors and the principle of protecting qualified wilderness study lands from incompatible development and activities. The alternate route south of the existing road corridor is definitely undeveloped land possessing wilderness potential.

e) It is feasible from an engineering standpoint to route the pipeline around the tight curve within the already impacted road corridor. The company has estimated that this alignment will cost about 1.5 million dollars more than the southerly route. I find this hard to believe since the distances are about equal and since there is the same elevation gain to the eastern rim in both cases.

f) Although the soils and rehabilitation potential may be better along the southerly bypass the overall difference would be minor since the pipeline would occupy a considerable length of the creek bottom in either event. This difference is more than offset by the two important principles previously referred to. Again, careful compliance with strict construction and reclamation standards is essential.

In summary, I strongly urge the BLM to route the pipeline within the already impacted road corridor on the basis of principle and to insure that one of the very finest potential BLM Wildernesses is not further compromised. This is clearly where we must draw the line. To do otherwise will most certainly bring about protests from the conservation community.

I've appreciated the opportunity to tour Bitter Creek and to offer these comments. Please keep me advised on further developments on this issue.

Sincerely,  
  
Bill Cunningham  
Regional Representative

cc: Montana Wilderness Association

12

MONTANA ASSOCIATION OF CONSERVATION DISTRICTS

Range, Forestry & Public Lands Committee:

Resolution No. 1

WHEREAS a tract of land in Valley County comprising 59,112 acres has been designated as a wilderness study area known as the Bitter Creek Wilderness area; and

WHEREAS there are numerous past evidences of the area having been inhabited by man such as fences, roads, reservoirs, etc.; and

WHEREAS there is still regular travel in the area for the purpose of managing livestock, hunting, fishing, camping, etc.; and

WHEREAS these evidences of man's encroachment on this area is in sharp conflict with wilderness requirement; and

WHEREAS these federal lands have been in the past and presently are being used under the multiple use concept, whereby agricultural interests are being served side by side with wildlife management.

NOW THEREFORE BE IT RESOLVED that the Montana Association of Conservation Districts recommend that the Bitter Creek Area not be designated as a wilderness area.

Adopted: November 9, 1983.

Resolution from: Area I (Valley CD)  
Area Resolution #2  
Committee Resolution # 1

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| DM                   | _____ | L & RS | _____ |
| ASSOC DM             | _____ | PA     | _____ |
| ADMIN                | _____ | ENV    | _____ |
| PRO                  | _____ | MIN    | _____ |
| OPS                  | _____ | RD     | _____ |
| USDI MAY 24 1984 BLM |       |        |       |
| RECEIVED             |       |        |       |
| BLM/STOWN, MT        |       |        |       |
| ACTION _____         |       |        |       |

13

CHARLES M. HAUPTMAN

GEOLOGIST

445 Hart Albion Bldg.

BILLINGS, MONTANA 59101

Telephone (406) 252-3605

April 2, 1984

|                     |       |        |       |
|---------------------|-------|--------|-------|
| DM                  | _____ | L & RS | _____ |
| ASSOC DM            | _____ | PA     | _____ |
| ADMIN               | _____ | ENV    | _____ |
| PRO                 | _____ | MIN    | _____ |
| OPS                 | _____ | RD     | _____ |
| USDI APR 4 1984 BLM |       |        |       |
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| BLM/STOWN, MT       |       |        |       |
| ACTION _____        |       |        |       |

Mr. Glenn W. Freeman  
District Manager, BLM  
Airport Road  
Lewistown, MT 59457

Re: Bitter Creek Wilderness Environmental Impact  
Statement(Draft), March 1984

Dear Mr. Freeman:

The BLM is to be commended for recommending the No Wilderness Alternative as the proposed action for the Bitter Creek area. I strongly support that recommendation.

The Bitter Creek area could very well contain substantial reserves of natural gas and also has considerable potential for petroleum. It would be the height of folly - certainly not in the national interest - to shut out exploration for these vital commodities.

Very truly yours,

*Charles M. Hauptman*  
C. M. Hauptman

CMH/s



14

|             |        |
|-------------|--------|
| DATE        | 1 & RE |
| ASSOC. DIR. | PA     |
| ADMIN.      | RVR    |
| FILE        |        |
| CLERK       | IND    |
| APR 4 1984  |        |
| RECEIVED    |        |
| WESTOWN, MI |        |
| ACTION      |        |

3-31-84

Dear Mr. Freeman,  
I favor the "all wilderness" alternative for Bitter Creek. I think the EIS Draft shows that the area is worthy of such protection for possible future use.

A It is especially important to restrict the use of ORVs in special and fragile areas like Bitter Creek because they can cause so much damage in such a short time. Alternative 2 will keep them out. It will also stop predator control. I oppose all predator control. Left alone they will control themselves based,

- 2 -

on the amount of prey available. This is really a very small area. Let's save it!

Sincerely,  
Muri Hoffman



610 East Sussex Avenue  
Missoula, Montana 59801  
March 31, 1984

DM \_\_\_\_\_ L & H \_\_\_\_\_  
 ASSOC. DM \_\_\_\_\_ PA \_\_\_\_\_  
 ADMIN. \_\_\_\_\_ RYS \_\_\_\_\_  
 P/TA \_\_\_\_\_ MIN \_\_\_\_\_  
 QPR \_\_\_\_\_ JUD \_\_\_\_\_  
 USDT APR 4 1984  
 RECEIVED  
 NEWTOWN, MT  
 ACTION \_\_\_\_\_

Glenn W. Fromman  
District Manager  
District Office  
Bureau of Land Management  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

Thank you for a copy of the Bitter Creek Draft Wilderness Statement. I noted a number of statements in the report which contradict certain facts regarding wilderness and the intent of the new House of Interior guidelines regarding grazing-in-wilderness.

I and other individuals and groups have been working on the problem of grazing in wilderness for a number of years. There are many facets of this use of wilderness which have yet to be worked out before any definitive statement can be made on the impact of wilderness on grazing. For example, what is the best method(s) and design(s) of stock facilities which will cause minimum disruption of wilderness values while at the same time cause the least impact on wilderness. This is a complex question that requires the involvement of all concerned parties (conservation organizations, Congress, land managing agencies, grazers).

Your statement that continued and periodic mechanized access and maintenance of livestock facilities would impact wilderness values is acknowledged in the new House guidelines. However, the RIM lists it as a reason for non-wilderness designation. Congress, through the guidelines, has stated that these encumbrances cannot be used to justify non-designation of a roadless area.

You also state that new facilities to redistribute livestock are not allowed under wilderness designation. If the purpose of the new facilities is to reduce grazing pressure on overused range, which is what you state, then such facilities would be allowable under the guidelines.

Your assessment of the changes in hunter use of the area if designated as wilderness is curious. Many hunters want a quality experience. More and more such experience comes from hunting in unroaded areas. The existing wilderness areas in the National Forest areas are an example where hunter utilization is very heavy. Consequently, wilderness designation could actually increase hunter use.

In your analysis you state that hunting related expenditures would decrease if the area was designated wilderness. The opposite could well be the case. The ranchers could realize an added income by guiding and packing for hunters, especially those coming from out of state. If this happens, the local economy would benefit from the added expenditures which do not exist at present.

The proposed action (No Wilderness) is extremely deficient in depicting what will happen to the area in the future. In all likelihood the no wilderness option would have a substantial impact of the redwood area. In the Little Missouri National Grassland Redwood area, which is to be managed as essentially redwood, we have seen a reduction in canopy from 1000 acres to 1000 acres. This is due to the loss of redwood due to energy exploration and development. You state that the Bitter Creek unit has portions with a high natural gas potential. It is very likely that we will see the same type of change in this area. If these events occur, soils, wildlife, vegetation, as well as the wilderness resource, would be severely impacted. Your impact analysis did not take into account the change. The statement "the remainder of the WSA would retain its wilderness value with or without wilderness designation" has no basis.

Your analysis gives the costs (public) of managing the area as wilderness. You do not, however, give the costs of managing the area as non-wilderness. There are numerous subsidies for the livestock industry for facilities and grazing improvement. You should list these public costs. One of the biggest expenses is the subsidization of grazing fees. This is not to say that such assistance is not warranted. However, it is not a good picture that wilderness costs the taxpayer money while grazing adds to governmental income. Such a situation is not always the case.

The BLM excludes flatter topography from wilderness because of lack of opportunities for solitude. These areas are potentially some of the most valuable additions to the National Wilderness System. They represent two distinct types of ecosystems with a transition zone. Efforts such be made to preserve a few examples.

Although deficient in many ways, the "Enhanced Wilderness Manageability" alternative is probably the best alternative.

Sincerely

Marlen Dreier

16 OIL AND GAS EXPLORATION

W. M. VAUGHNEY, JR.  
P.O. Box 48  
HAVER, MONTANA 59801-0048  
(406) 325-9331

|                                   |                           |
|-----------------------------------|---------------------------|
| DM                                | 1 & 2                     |
| ASSOC. DM                         | PA                        |
| ADMIN.                            | PPC                       |
| P/NA                              | MIN                       |
| OPS                               | RUP                       |
| LEWISTOWN BLM                     |                           |
| Lewis and Clark National Monument |                           |
| Management                        | LEWISTOWN DISTRICT OFFICE |
| ACTION                            | For Release 03-30-84      |

Call Gary Pavel: 406-528-7461

*Best to see, Helen!*  
*I congratulate you and the staff!*  
*Sincerely,*  
*Bill*

LEWISTOWN -- The Bureau of Land Management has proposed the Bitter Creek area in Valley County, Mont., not he designated as wilderness.

The 50,660-acre study area is the subject of a recently released draft environmental impact statement.

While the Federal agency proposes the no wilderness alternative, the impact statement also considers the possibility of recommending all 50,660 acres for wilderness as well as recommending designation for 39,950-acre or 26,000-acre portions of the study area.

"We determined the consequences of designation, evaluated the overall wilderness quality and estimated future external threats to wilderness values," said Glenn Freeman, BLM's Lewistown District Manager. "We found that it just didn't appear to be in the public interest to recommend the area for wilderness designation."

The impact statement is subject to a 90-day public review. Hearings on the document are scheduled in Glasgow at the Valley County Courthouse on May 15 at 7:30 p.m. and in Helena at Jernenson's Holiday Motel, 1714 11th Avenue on May 17 at 7:30 p.m.

(Horn)

17

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|-----------------|-------|
| DM              | 1 & 2 |
| ASSOC. DM       | PA    |
| ADMIN.          | PPC   |
| P/NA            | MIN   |
| OPS             | RUP   |
| APR 10 1984 BLM |       |
| RECEIVED        |       |
| 5500            |       |
| LEWISTOWN, MT   |       |
| ACTION          |       |

2921 NE 53rd Street  
Highhouse Point, Florida  
April 4, 1984

Mr. Glenn W. Freeman  
District Manager  
Lewistown District Office  
Bureau of Land Management  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

I support the All Wilderness Alternative for the establishment of an 59,660 acre

- A Bitter Creek Wilderness. Certainly the sightings of gray wolves in this area  
B justify the establishment of wilderness. This area might add ecosystem to the  
C Wilderness System not currently represented in that system. It would also offer  
primitive and unconfined recreation without interfering that much with existing  
vehicle use. Thank you for this opportunity to comment.

Sincerely,  
*Richard Green*  
Rand Secord

18



**McCOLLY RANCH, Inc.**  
P.O. Box 98  
**Hinsdale, Montana 59241**

Phone: Office (406) 364-2214  
Ranch (406) 648-5456  
April 10, 1984

|   |     |    |
|---|-----|----|
| DR  | LS  | RD |
| ASSOC   | PA  |    |
| ADMIN   | PVE |    |
| P/BA  | MTH |    |
| OPS   | RD  |    |
| RECD APR 16 1984<br>RECEIVED<br>LEWISTOWN, MT<br>ACTION |     |    |

Glenn W. Freeman, District Manager  
Bureau of Land Management  
Airport Road  
Lewistown, MT 59457

Dear Glenn,

It is indeed a pleasure and a privilege for me to convey to you my appreciation for the very practical and sensible recommendation of "No Wilderness Designation" for the Bitter Creek Area in the analysis of the BLM environmental review for that area.

For those of us who live by, and are associated with the land, our confidence and faith in the judgmental decisions of the BLM -- the stewards of our public lands -- has increased many-fold by that decision!

Thank you for your intelligent decision!

Respectfully yours,

*Robert McColly*  
Robert McColly

cc: Penfold  
Melcher  
Baucus  
Marlenee

**EAT DELICIOUS BEEF - MONTANA BEEF IS BEST**

19



**HINSDALE LIVESTOCK COMPANY**  
BOX 429, GLASGOW, MONTANA 59229  
Gene Eckert -- Jim Eckert -- John Eckert

Mr. Glenn Freeman  
District Manager BLM  
Lewistown, Montana

Dear Glenn:

I have read hurriedly much of the Draft EIS covering the Bittercreek Wilderness Study Proposal. BLM is to be complimented for arriving at the conclusions which lead to the preferred alternative or course of action.

Principally it seems to me that BLM has heeded the comments and wishes of the public which as the document points out had strong feelings on this proposal. The public here felt there was no need or demand at this point in time for a Wilderness set aside and BLM made an intelligent decision taking into account this and all the other facts, most of which would lead them to the same conclusion. Please place me on record as favoring the proposed action of "no wilderness"

FOR  
HEALTH'S SAKE  
EAT MORE BEEF

*Sincerely,  
Gene Eckert*

|   |     |    |
|---|-----|----|
| DR  | LS  | RD |
| ASSOC   | PA  |    |
| ADMIN   | PVE |    |
| P/BA  | MTH |    |
| OPS   | RD  |    |
| RECD APR 17 1984<br>RECEIVED<br>LEWISTOWN, MT<br>ACTION |     |    |

4-16-84

20

P.O. Box 4656  
Helena, Montana 59604  
April 18, 1984

Michael Penfold, State Director BLM  
c/o Glenn Freeman, District Manager BLM  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Penfold and Mr. Freeman,

Thank you for this opportunity to comment on your draft Bitter Creek  
Wilderness Environmental Impact Statement, issued March 1984.

I was startled by the BLM's recommendation of no wilderness. BLM has  
been the poorest of all federal agencies in adequately assessing the  
need for wilderness protection of some its lands. I had hoped the  
efforts of recent years might change the country's most distinctly  
anti-wilderness bureaucracy. The need for wilderness is clear -  
we all know this. This explains the urgency of the "Wett" mindset  
as it tries to destroy what little there is left before people  
successfully organize to protect it.

There was some valuable information in your draft e.i.s. But innovation  
was lacking in one of the most ecologically significant issues - reintroduction  
of endangered species. There was no consideration that I could find.  
This is unfortunate. Especially concerning the importance of re-establishing  
wolves in this part of northeastern Montana, your draft e.i.s. was inadequate.  
I hope you will correct this oversight for your final e.i.s.

Reintroduction of endangered species and maintenance of biological diversity  
will best be accomplished under the all wilderness alternative. I favor  
this alternative. Your contention that hunting revenues would be reduced  
by wilderness designation is ridiculous. Anybody who hunts (myself included)  
knows that wilderness is the best guarantee of sustained productivity of  
game. If Bitter Creek was protected, the area's economy would enjoy long  
term economic benefits from hunting which could not possibly be equalled  
by easy access and short term depletion. It is hard to believe your experts  
could be biased to the point of being that irrational. All they would have  
to do is look at the figures from the Bob Marshall and other areas.

Game serves the public. Short term economic exploitation has been the name  
of the game for the last 100 years. Stewardship should be the name of the  
game for the next 100. Please throw out your draft e.i.s. recommendations  
and give this area the protection it deserves.

Sincerely,

*Paul Richards*  
Paul Richards

|                  |      |            |  |
|------------------|------|------------|--|
| DATE             | 4/22 | U.S. DEPT. |  |
| ASSOC. DIR.      | PA   |            |  |
| ADMIN.           | BY   |            |  |
| P/SA             | 2    | BY         |  |
| OPS              |      | BY         |  |
|                  |      | BY         |  |
| USDI APR 20 1984 |      |            |  |
| RECEIVED         |      |            |  |
| LEWISTOWN, MT    |      |            |  |
| ACTION           |      |            |  |

21



*The Big Sky Country*  
MONTANA STATE SENATE

SENATOR MARK ETCHART  
SENATE DISTRICT 2

HELENA ADDRESS  
CAPITOL BUILDING  
HELENA, MONTANA 59620  
PHONE (406) 447-4887

HOME ADDRESS  
P.O. BOX 379  
GLASGOW, MONTANA 59230

B.L.M. Office  
Rt. 1-4775  
Glasgow, Mt. 59230

Subject: Bittercreek Wilderness Area

This letter is to indicate my support for the position  
that B.L.M. has taken regarding the Bittercreek Area.

It has been a long and tortuous process but I think you  
reached the right conclusion when the alternative of no  
wilderness for Bittercreek was recommended. Please  
record me as approving your actions and I hope that this  
course of action finally prevails.

Sincerely,

*Mark Etchart*  
Mark Etchart

|                  |    |
|------------------|----|
| ASSOC. DIR.      | PA |
| ADMIN.           | BY |
| P/SA             | 2  |
| OPS              |    |
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| USDI APR 30 1984 |    |
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| LEWISTOWN, MT    |    |
| ACTION           |    |

COMMITTEES  
FINANCE & CLAIMS  
INDEMNITY & COMPENSATION: CHAIRMAN  
NATURAL RESOURCES

|                      |            |
|----------------------|------------|
| RECEIVED             |            |
| VALLEY RESOURCE AREA |            |
| USDI                 | APR 20 '84 |
| BLM                  |            |
| Route 1-775          |            |
| Glasgow, MT          |            |
| Action 121           |            |
| Position             | Info       |
| Area Mgr.            |            |
| R. Co. (Sup.)        |            |
| Range Con.           |            |
| Range Com.           |            |
| Wildlife Biol.       |            |
| Wildlife Dist.       |            |
| Wildlife Spec.       |            |
| Engineer Tech.       |            |
| Range Tech.          |            |
| Recreation           |            |

23

Atlantic Richfield Company 555 Seventeenth Street  
Denver, Colorado 80202  
Telephone 303 293 7577

J. R. Mitchell  
Manager  
Public Lands Coordination  
Government Relations

April 27, 1984

Mr. Glenn W. Freeman  
District Manager  
Great Falls District  
Bureau of Land Management  
Airport Road  
Levistown, MT 59457

Re: Bitter Creek Wilderness Study Area  
Draft Wilderness Environmental Impact Statement

Dear Mr. Freeman:

Atlantic Richfield Company appreciates the opportunity to comment on the Bureau of Land Management's Draft Wilderness Environmental Impact Statement for the Bitter Creek Wilderness Study Area in Montana.

We support the Bureau's Preferred Alternative, which recommends a nonwilderness designation for Bitter Creek. We endorse BLM's decision that the market resource values outweigh the wilderness values of the WSA. This view is supported by the fact that the Bitter Creek WSA has highly favorable potential for accumulation of natural gas and that 54,700 of the 59,660 acres contained in the WSA acres are currently under lease.

We are pleased that the Bitter Creek area will be open to hydrocarbon development. It is essential that those lands with energy potential are left open so that the nation's dependence on foreign sources of energy can be reduced.

Sincerely,

*J. R. Mitchell*  
J. R. Mitchell

JRM:CHM:dcm

|                     |       |
|---------------------|-------|
| DM                  | L & M |
| ASSOC. DM           | PA    |
| ADMIN.              | BYE   |
| P/EA                | MIN   |
| OPR                 | AUD   |
| USDI MAY 2 1984 BLM |       |
| RECEIVED            |       |
| LEWISTOWN, MT       |       |
| ACTION              |       |



23

|                      |       |
|----------------------|-------|
| DM                   | L & M |
| ASSOC. DM            | PA    |
| ADMIN.               | BYE   |
| P/EA                 | MIN   |
| OPR                  | AUD   |
| USDI MAY 14 1984 BLM |       |
| RECEIVED             |       |
| LEWISTOWN, MT        |       |
| ACTION               |       |

I would like to go on record of

- ☒ Supporting  
☐ Not Supporting

BLM's proposed action of "No Wilderness Alternative" as described on page 5 of the Bitter Creek Draft Wilderness Environmental Impact Statement dated March, 1984.

Sincerely

Name Eric W. Smith  
Address 29.8 222  
257 additional cards

257 additional cards were received

29 supporting other than the proposed action  
228 supporting the proposed action



24

We, the undersigned, support the proposed action - "No Wilderness Alternative" on page 5 of the Bitter Creek Wilderness Environmental Impact Statement dated March 1984.

- 1 John W Black
- 2 Robert W Black
- 3 Sam Egan
- 4 Mark Fauth
- 5 Dan Swanson
- 6 Mike Pratt
- 7 Jim Ritchey
- 8 Wayne Fitch
- 9 [Signature]
- 10 Bob McCall
- 11 Hanson Bailey Jr.
- 12 Marlene Niles
- 13 Charles McVee
- 14 Garrett McInerney
- 15 Jesse Rausch
- 16 Jim McCall
- 17 [Signature]
- 18 [Signature]
- 19 [Signature]
- 20 David Connell
- 21 Robert Stratford
- 22 LaCrosse Whitland
- 23 Mike [Signature]

|               |     |    |
|---------------|-----|----|
| DR            | LS  | SP |
| ASSOC. CH.    | PA  |    |
| ADMN.         | PVA |    |
| P/EA          | MR  |    |
| OP            | MD  |    |
| MAY 22 1984   |     |    |
| RECEIVED      |     |    |
| LEWISTOWN, MT |     |    |
| ACTION        |     |    |

25

M

O.E. Markle  
742 7th Ave. No.  
Glasgow, MT 59230

Office: (406) 228-9365  
Home: (406) 228-2282

|               |     |    |
|---------------|-----|----|
| DR            | LS  | SP |
| ASSOC. CH.    | PA  |    |
| ADMN.         | PVA |    |
| P/EA          | MR  |    |
| OP            | MD  |    |
| MAY 22 1984   |     |    |
| RECEIVED      |     |    |
| LEWISTOWN, MT |     |    |
| ACTION        |     |    |

May 22, 1984

To Whom it May Concern -

After talking to many of our customers, I wish to go on record as opposing the Bitter Creek Wilderness Area.

In my view, the project is unnecessary and detrimental to this area.

O.E. Markle  
Box 71  
Glasgow

- 24 [Signature]
- 25 [Signature]
- 26 [Signature]
- 27 [Signature]
- 28 [Signature]
- 29 [Signature]
- 30 [Signature]
- 31 [Signature]

III

Some 40 Valley County residents turned out in Helena on May 22 and relative to the Bitterroot E.I.S. all of these people in one way or another testified in favor of the alternative chosen by B.L.M. and that being, "no wilderness" as has been printed out in the E.I.S. the vast majority of local people in the Valley County area opposed the formation of a wilderness in the Bitterroot area.

I think that it is an example of the public participation process <sup>working</sup> that B.L.M. has weighed the comments of the "public" involved and have come up with a recommendation which is so widely opposed of in the Valley County area and which was unanimously approved at the May 22 hearing in Helena. B.L.M. is to be commended for coming up with a sound and sensible decision after completing their study.

Thank you  
Gene Stetson

|                 |       |
|-----------------|-------|
| DATE            | 1 & 2 |
| ASSOC. DIR.     | PA    |
| ADMIN.          | BY    |
| FIELD           | BY    |
| OPS             | BY    |
| DATE            | 1 & 2 |
| MAY 24 1984 BLM |       |
| RECEIVED        |       |
| HELENA, MT      |       |
| ACTION          |       |

29

# MONTANA MAGAZINE

P.O. Box 5630 • 3070 Rossmore Ave., Helena, MT 59604 • Phone 406/442-2842

|                 |       |
|-----------------|-------|
| DATE            | 1 & 2 |
| ASSOC. DIR.     | PA    |
| ADMIN.          | BY    |
| FIELD           | BY    |
| OPS             | BY    |
| MAY 30 1984 BLM |       |
| RECEIVED        |       |
| HELENA, MT      |       |
| ACTION          |       |

May 29, 1984

Glen Freeman  
District Manager  
Bureau of Land Management  
Airport Road  
Lewisville, Montana 59457

Position by Rick Greaux, MONTANA MAGAZINE, on the Bitter Creek Wilderness Proposal

I support alternate 3 of the EIS, and ask for creation of a 39,950 acre Bitter Creek East Wilderness. This is a unique opportunity to preserve some native prairie and the BLM has a duty to the public to recommend passage of such a wilderness.

*Rick Greaux*  
Rick Greaux  
Publisher

30

|                           |             |
|---------------------------|-------------|
| DATE                      | 1 5 82      |
| ASSOC. DIR.               | PA          |
| ADMIN.                    | BY          |
| F/EA                      | MIN         |
| OPS                       | NO          |
| USDI                      | MAY 31 1984 |
| RECEIVED<br>LEWISTOWN, MT |             |
| 5/29/84                   |             |
| ACTION                    |             |

Dear Mr. Freeman

I am writing to offer my strong support for Alternative 3, the 39, 950 acre Bitter Creek East Wilderness. I feel this alternative would protect an extremely important and needed addition to the national wilderness system and eliminate all of the potential conflicts.

As far as dealing with local opposition to any more wilderness, period; the wilderness system is national in scope and a resource for the nation. Many of the local residents do not realize that we possess many of the last remaining wild landscapes represented by Bitter Creek, the Great Plains Shortgrass Prairie ecosystem. Montana should feel fortunate to be able to offer the nation a resource of such vastness, quality, and value.

I again offer my support for Alternative 3 and hope you will look at the future and support the Bitter Creek East Wilderness Alternative. Such action would be in the best long term interest of our society. Thank you.

Sincerely  
Robert Ost

31

DEER LODGE CLINIC, P.C.  
FRANK N. SMITH, M.D.  
STANLEY N. SMITH, M.D.  
SHEILA E. SMITH, M.D.  
LEAH D. SMITH, M.D.  
INTERNAL 7722



PROFESSIONAL PLAZA

1111 Maryland Ave.  
Deer Lodge, Montana 59722

May 29, 1984

Glenn Freeman  
District Manager, BLM  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

I have been a resident of Montana for the past thirteen years and one of the prime moving forces in my locating in Montana was to enjoy the pristine outdoor life that this beautiful state provided.

I spent the better part of my life in Nevada and spent a good share of my medical training in Oregon and Southern California and I have learned, all too unfortunately, what uncontrolled development can do to these states. As you can tell, I have spent a good share of my time in an area where prairie or desert country is abundant. Because of my interest in seeing prairie areas preserved in a natural state, I am writing this letter in regards to the Bitter Creek East Wilderness area.

I would like to speak strongly on behalf of having the Bitter Creek East Wilderness area be considered as a Prairie Wilderness, when your department reviews the public recommendations. I personally feel that the Bitter Creek East does indeed possess high wilderness suitability in the form of naturalness, outstanding altitude, primitive recreation and is a vital ecological niche for wild life.

I appreciate any consideration you may offer in support of this endeavor.

With warm personal regards,

Stanley N. Smith

Stanley N. Smith, M. D.

|                           |             |
|---------------------------|-------------|
| DATE                      | 1 5 82      |
| ASSOC. DIR.               | PA          |
| ADMIN.                    | BY          |
| F/EA                      | MIN         |
| OPS                       | NO          |
| USDI                      | JUN 01 1984 |
| RECEIVED<br>LEWISTOWN, MT |             |
| ACTION                    |             |

32

DOUGLAS H. CHADWICK  
R03-175  
FILL (BUREAU) MONTANA 59722

May 23, 1984.

Mr. Glenn Freeman, Dist. Mgr.  
B.L.M.  
Airport Rd.  
Lewistown, MT 59457

|                           |         |
|---------------------------|---------|
| DR                        | L.S. FF |
| ASSOC. DR.                | PA      |
| ADMIN.                    | PVE     |
| F/BA                      | ATH     |
| DPE                       | FUD     |
| JUN 4 1984 BLM            |         |
| RECEIVED<br>LEWISTOWN, MT |         |
| ACTION                    |         |

Dear Mr. Freeman,

I am writing to urge you to set aside the 59,660-acre Bitter Creek Wilderness Study Area in its entirety in order to protect some of our wild shortgrass prairie lands. I think Montana's preservation policies are fairly lenient in terms of setting aside far too many ice-covered rocks and far too little of what was our nation's greatest ecosystem - the Great Plains

our equivalent of Africa's wildlife-rich savannas. Our efforts at preserving America's plains would be unworthy of an impoverished Third World Country.

Why haven't you recommended any Bitter Creek wilderness? Local opinion? What's the best choice in terms of the nation's interest? Or for my children and their children? It sure seems to me that we could use some wild prairie. You ought to come saddle up over here, where the Bob Marshall Wilderness has 300,000 visitor days annually, and 10,000 head of pack stock. We need more and more diverse Montana wildlands.

Anyway, I hope you'll change your mind and add some Great Plains ecosystem to our heritage. Bitter Creek is surely not a very big chunk. We ought to have an area about the size of East Africa's Serengeti. For the richest nation on earth, our savanna biome sure got cut up and oversold.

Sincerely, Douglas H. Chadwick

33

|                           |         |
|---------------------------|---------|
| DR                        | L.S. FF |
| ASSOC. DR.                | PA      |
| ADMIN.                    | PVE     |
| F/BA                      | ATH     |
| DPE                       | FUD     |
| JUN 5 1984 BLM            |         |
| RECEIVED<br>LEWISTOWN, MT |         |
| ACTION                    |         |

802 St. Marys  
Deer Lodge, Montana 59722  
June 3, 1984

Glenn Freeman  
District Manager, BLM  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

I am writing this letter to support wilderness classification for the 59,660 acre BLM Bitter Creek Wilderness Study Area. We already have enough (Don't get me wrong, we need more!) high mountain wilderness areas, but very little prairie wilderness. I support Alternative 3, a 39,950 acre Bitter Creek East Wilderness Area, as proposed by the Montana Wilderness Association. I believe it is the obligation of federal land managers to take the interests of all citizens, not just those who live close by, into consideration on any particular wilderness proposal.

Sincerely,

Lee Silliman  
Lee Silliman

34

Marc Jauhainen  
541 Woodward St.  
Missoula, MT 59801

Glenn Freeman  
District Manager  
BLM  
Airport Road  
Lewistown, MT 59457

|                 |       |
|-----------------|-------|
| DM              | LA SR |
| ASSOC. DM       | PA    |
| ADMIN.          | PR    |
| ESA             | WIL   |
| CFR             | WUC   |
| JUN 11 1984 BLM |       |
| RECEIVED        |       |
| LEWISTOWN, MT   |       |
| ACTION          |       |

Dear Dist. Manager Glenn Freeman,

I'm writing to you because I am very concerned about the Bitter Creek East Wilderness. This area consisting of 38,950 acres must be saved. My concern for this area centers around the following reasons why. This area must be protected. First et al, Bitter Creek would fill a vital ecological niche which, outside of the U-L Bend Wilderness, is not represented in our National Wilderness System. Secondly, Bitter Creek is also one of our nation's last remaining natural Great Plains Shortgrass Prairie ecoregions. Thirdly, this area is very important habitat for large numbers of mule deer and other wildlife species.

Thanks for taking the what I have said into heart.

Sincerely,  
Marc Jauhainen

35

|                 |       |
|-----------------|-------|
| DM              | LA SR |
| ASSOC. DM       | PA    |
| ADMIN.          | PR    |
| ESA             | WIL   |
| CFR             | WUC   |
| JUN 13 1984 BLM |       |
| RECEIVED        |       |
| LEWISTOWN, MT   |       |
| ACTION          |       |

June 8, 1984  
PIS #476  
135 N. Oakland Ave.  
Pasadena, CA 91101

Glenn Freeman  
District Manager, BLM  
Airport Road  
Lewistown, MT 59457

Dear Glenn,

As a former Montana resident (who wants to move back) and a wilderness lover I wish to express my support of the designation of 39,950 acres of the Bitter Creek Wilderness Study Area as protected wilderness, in keeping with Alternative J.

I understand that this would preserve one of the nation's last Great Plains Shortgrass Prairie ecoregions. I believe that preserving the past is important in preparing us for the future. In addition, the region offers recreation for the many, and a chance for the solitude that shaped the people of Montana.

Sincerely,

*Marc Jauhainen*  
Eric Jauhainen



119 East Church St.  
Grafton, Me 01701 6/13/84

June 13<sup>th</sup>

Dear Mr. Anderson -

I am writing as a WA member, a native  
Maine who plans to retire this but most as a  
concerned citizen suggesting wilderness areas for  
our city and future generations who will still  
use for the smallest needed wilderness are  
the best to preserve for their benefit.  
I am sure you will support Alternative 3.  
The 39,950 Bitter Creek East Wilderness.  
has been a source of grass for  
Maine and would support the change to  
all kinds of wild, native species.  
The great place for our children & future.

Sincerely,  
Harold K. Nelson

|                           |        |
|---------------------------|--------|
| DM                        | L & RR |
| ASSOC. DM.                | PA     |
| ADMIN.                    | RVR    |
| P. EA                     | MIN    |
| OPR                       | JUD    |
| JUN 16 1984 BLM           |        |
| RECEIVED<br>LEWISTOWN, MT |        |
| ACTION                    |        |

6-11-84

I would like to go on  
record of supporting BLM's  
proposed action of "No  
Wilderness Alternative" as  
described on page 5 of the  
Bitter Creek Draft Wilderness  
Environmental Impact Statement  
dated March 1984

|                           |        |
|---------------------------|--------|
| DM                        | L & RR |
| ASSOC DM                  | PA     |
| ADMIN                     | RVR    |
| P. EA                     | MIN    |
| OPR                       | JUD    |
| JUN 18 1984 BLM           |        |
| RECEIVED<br>LEWISTOWN, MT |        |
| ACTION                    |        |

Sincerely,  
Carol J. Bailey  
7 S E Box 161  
Ashua Mt 59248

38

6-11-84

I would like to go on record of supporting BLM's proposed action of "No Wilderness Alternative" as described on page 5 of the Bitter Creek Draft Wilderness Environmental Impact Statement dated March 1984.

|                      |       |     |       |
|----------------------|-------|-----|-------|
| DM                   | _____ | LE  | _____ |
| ASSOC. DM            | _____ | PA  | _____ |
| ADMIN.               | _____ | EVS | _____ |
| P/EA                 | _____ | MIN | _____ |
| OPR                  | _____ | JUD | _____ |
| USDI JUN 18 1984 BLM |       |     |       |
| RECEIVED             |       |     |       |
| LEWISTOWN, MT        |       |     |       |
| ACTION _____         |       |     |       |

Sincerely,

Dwight A. Sibley  
NSR Box 161  
Nashua, Mont. 59248

39

June 11, 1984

Dear Sir:

I would like to go on record of supporting BLM's proposed action of "No Wilderness Alternative" as described on page 5 of the Bitter Creek Draft Wilderness Environmental Impact Statement dated March 1984.

|                      |       |     |       |
|----------------------|-------|-----|-------|
| DM                   | _____ | LE  | _____ |
| ASSOC. DM            | _____ | PA  | _____ |
| ADMIN.               | _____ | EVS | _____ |
| P/EA                 | _____ | MIN | _____ |
| OPR                  | _____ | JUD | _____ |
| USDI JUN 18 1984 BLM |       |     |       |
| RECEIVED             |       |     |       |
| LEWISTOWN, MT        |       |     |       |
| ACTION _____         |       |     |       |

Sincerely,

Dwight A. Sibley  
NSR Box 161  
Nashua, Mont.  
59248

(40)

|               |     |
|---------------|-----|
| ASSOC. CH.    | PA  |
| ADMIN.        | PVE |
| DATA          | WFO |
| OPS           | PUP |
| JUN 22 1984   |     |
| RECEIVED      |     |
| LEWISTOWN, MT |     |
| ALBANY        |     |

1870 Orrington Avenue  
Evanston, Illinois  
June 8, 1984

Mr. Glenn W. Freeman  
District Office, Bureau of Land Management  
Airport Road  
Lewistown, Montana 59457

Dear Mr. Freeman:

Having read the draft of the Wilderness Environmental Impact Statement of March 1984 in reference to Bitter Creek, we wish to file our comments on this document. We oppose the recommendation of the impact statement not to designate all of Bitter Creek an official wilderness area. It is our opinion that all of Bitter Creek should be categorized as wilderness, or failing that, it is preferable to approve at least a portion of this area as wilderness rather than enact the No Wilderness proposal. This opinion is based on the principle that maintaining the natural state of America in as many areas as possible is far more important than acquiring more unrecyclable resources through a process that would disrupt and destroy the natural state of the area.

Responding to points in the order in which they are presented, our first disagreement concerns the statement which declares that if action is taken on the recommended proposal there will be "little or no" environmental impact on grazing, cultural resources, or wildlife - their populations or resources from any area without any harm resulting. It is obvious that there will always be some impact on grazing, cultural resources, and wildlife. "No" impact is evidently impossible. In fact, the BLM admits that "wilderness benefits to wildlife would be foregone. Wildlife would not receive a secure area since the present relatively high incidence of off-road vehicle travel would continue." (p. 37) In our opinion, the removal of clubbuses by chiselcane, and the 2 1/2 miles of fence, the 2 miles of water/pipeline, the stockwater tanks, and the 4 reservoirs to be constructed under the proposal will destroy the naturalness of Bitter Creek and result in much more than a "little" impact. These intentions should not be carried out in an area which is currently in a natural state. The BLM concurs with this opinion when it states that "... wilderness values in the WSA are expected to suffer some adverse impacts." (p. 37)

2

Moreover, reasons for the removal of the clubbuses or for the various items proposed for construction are not documented in this statement. In order to inform the reader so that he may be able to intelligently produce an opinion, any environmental impact statement should provide accurate and clear reasons for any resulting changes in the environment. The environmental impact statement concerning Bitter Creek fails to provide this vital information.

Despite the fact that most local ranchers and residents seem to favor the continuation of Bitter Creek as a Wilderness Study Area, many opinion surveys indicate that a significant proportion of state and national populations hold the attitude that there is currently a wilderness shortage. Thus, it is apparent that having Bitter Creek designated all wilderness is in the long-term interest of the nation. It is necessary to see beyond the short-term and local interests and realize that the residents of the area near Bitter Creek are confined to a narrow outlook which pertains to only their concerns. Also, in the interest of providing all vital information, names of the groups involved should be specified.

According to those who prepared this impact statement, one of the several significant concerns in any wilderness project is the quality of the wilderness whose future status is being debated. The statement considers Bitter Creek an uncommon ecotype due to the fact that it is a prairie and as such, it is a rarity in the wilderness system. Why then, does the BLM refuse the opportunity to add a prairie to the system? A sufficient answer to this inquiry is not identified in the document, but in our opinion, any attempt to provide an answer would be inadequate.

The BLM claims it prefers the No Wilderness alternative because the Bureau favors "resource production over preservation of the identified wilderness values." (p. 5) First, the statement provides no evidence maintaining the need for these resources and resource production. This omission should be corrected with verification of the necessity of continued resource production in this area. However, this verification of the need for resources can be controversial and thus, refuted. It also can be debated whether or not Bitter Creek is the most appropriate place to explore and develop resources. It is our belief that Bitter Creek serves the nation better and has more value in its natural state.

The conditions which will exist in Bitter Creek under the No Wilderness alternative are such that harm to the area will result. These conditions include: lack of restrictions on hunting, vehicle access, and "machine-based control;" the use of chemicals to control noxious weeds; and an increase in leases for the exploration of natural gas. In addition, with increased industrial activity in Bitter Creek, eventually it would no longer be possible to state that quality is excellent in Bitter Creek because of the lack of

human activity and nearby industry." (p. 15) as the BLM claims in the draft EIS. It is important that Bitter Creek is preserved in its natural state and that these hazardous consequences be prevented.

I we are also concerned about certain kinds of wildlife near the Wilderness Study Area. The gray wolf and the bald eagle, which are threatened or endangered species and important to America's culture, inhabit the Bitter Creek area at some point in time each year. It is suspected that the peregrine falcon, another endangered animal, may also spend time in Bitter Creek. It is best that Bitter Creek be declared officially wilderness due to the fact that it is vital that no harm come to these or any animals. Adopting the All Wilderness proposal would guarantee the necessary protection of these animals.

In conclusion, it is our hope that the BLM will reconsider and reverse its position and maintain Bitter Creek as a natural area, an area so vital to America's future generations.

Sincerely,

Christin Engelhardt

Christin Engelhardt

Jackie Selley  
Jackie Golley

Lori H. Watson  
Lori Watson  
Northwestern University

(41)

June 21, 1984

Glenn Freeman

BLM

Airport Rd.

Leavittown, MT

|                            |             |      |  |
|----------------------------|-------------|------|--|
| DATE                       | JUN 25 1984 | BY   |  |
| ASSOC. DIR.                |             | PA   |  |
| ADMIN.                     |             | OFF. |  |
| PLA.                       |             | REC. |  |
| DIR.                       |             | FILE |  |
| RECEIVED<br>LEAVITTOWN, MT |             |      |  |
| ACTION                     |             |      |  |

Dear Mr. Freeman:

I am writing to voice support for designation of a portion of the Bitter Creek area in Valley Co. as a wilderness area. I was disappointed to hear that the draft EIS for this area did not recommend wilderness designation. It is my opinion that Alternative 3, a 39,950 acre Bitter Creek East Wilderness would be most appropriate. This alternative is a compromise which would protect the wild core of the area and still eliminate conflicts with local interests.

A It would be very unfortunate if we were to preserve a great deal of our forests and mountains and then neglect such a primitive grassland ecosystem as Bitter Creek.

Alternative #3 is a compromise between varied interests. To recommend no wilderness would be a great disservice to a majority of the people of Montana.

Sincerely,

James and Susan McCauley  
6166 Hwy. 12 W.  
Helena, MT 59601

James C. McCauley  
Susan McCauley

42

Hello Glenn Freeman,

June 20, 1984

I am writing this letter in support of the BitterCreek East Wilderness Alternative. This area (Study Area) is very important to our natural resources which grow wild in this area. Besides having a wildlife species such as muledeer, please realize that it is one of our nations last remaining natural Great Plains Shortgrass Prairie ecoregions. Let this region be wild....

Karen Nielsen  
5330 Jimtown Rd.  
Helena, Montana 59601  
1-406-475-3563

|                |             |       |
|----------------|-------------|-------|
| DATE           | JUN 27 1984 | LA 22 |
| ASSOC. DIR.    | PA          |       |
| ADMIN.         | BVA         |       |
| F/EA           | MTN         |       |
| OPS            | WFO         |       |
| USED           | JUN 27 1984 | BLM   |
| RECEIVED       |             |       |
| LW/STERNAL, MT |             |       |
| ACTION         |             |       |

43

Box 648  
Glasgow, Montana 59230  
June 27, 1984

|                |             |
|----------------|-------------|
| ASSOC. DIR.    | PA          |
| ADMIN.         | BVA         |
| F/EA           | MTN         |
| OPS            | WFO         |
| USED           | JUN 28 1984 |
| RECEIVED       |             |
| LW/STERNAL, MT |             |
| ACTION         |             |

Glenn W. Freeman  
District Manager  
District Office BLM  
Airport Road  
Lewistown, Montana 59857

Dear Mr. Freeman:

This letter is to add my support for consideration of the Bitter Creek East Alternative for Wilderness designation. Recent rumors have promoted my support since the BLM came out with the recommendation that none of Bitter Creek WSA be designated as wilderness and instead be managed for multiple use.

Multiple use for whom? Multiple use for a few huge stockranchers and a few privileged hunters. The ordinary person dare not traverse on these lands under these stockmen's domain. I know of their concern for rustlers, but there appears to be more than this in some of the tales.

We are experiencing one of the most devastating droughts since the thirties. Who will come out on top? Only the large stockmen who can recoup financial support, or those who have turned land speculators and sold out to the "cud-buster" for his financial gain.

Much of Bitter Creek is a prairie which can easily be "busted" with huge equipment with no consideration for the land. Land trades are buzzing all over Valley County now. Bitter Creek has been a political, emotional "side-pull" to many of Valley Counties problems from the Air Base, VTP, and the re-reg dam at Fort Peck, and now the Cottonwood Inn development.

Anyone who dares mention Bitter Creek as a wilderness is considered the enemy of total destruction of Valley County Development program. Any BLM employee would never dare support a wilderness in the town of Glasgow and come out without "scars".

My concern is not for my welfare but for the Canadian-International herd of antelope. Bitter Creek is the last vestige for them. My concern is for the sage grouse, the sandow lark, other native birds, as well as migrating birds. Yes, even the Jack-Rabbit who has to pack his lunch in these dry times.

The benefits of a real Wilderness in Eastern Montana could be a tremendous asset for the generations to come. The historical significance of this area should be preserved for posterity. The antiquity for our times has no greater significance.

Best wishes in your endeavors.

Most sincerely,

*Lawrence B. Baker*



67 Garfield Street  
Cambridge, Massachusetts 02138

June 27, 1984

David E. Little  
Associate District Manager  
Bureau of Land Management  
Lewistown District Office  
Airport Road  
Lewistown, Mt. 59457-1300

Dear Sir:

**Enhanced Wilderness Manageability Alternative:**

I am selecting this alternative, due in part, that it "retains the outstanding wilderness values described in the Bitter Creek East Alternative while eliminating many of the resource conflicts and improving the potential for long term manageability." The exclusion of 1040 acres of non-Federal in-holdings and the removal of an irregular boundary on the north, replacing it with the east fork of Willow Creek, all adds up to fewer resource conflicts.

In this alternative, 26,000 acres will be designated as wilderness and will be closed to ORVs. Four existing vehicle ways totalling 12.5 miles would be closed to vehicle based hunting. These stipulations allow those who prefer the more primitive type recreation to backpack, hike trails, camp out, ride horseback and offers quiet enjoyment to non-hunter visitors. A total of 33,660 acres will be open to ORVs.

In this alternative, 300 hunter days would be allowed. (Current level is 450 days.) Restrictions on motor vehicle use would result in a decrease of 150 days annually in the short and long terms. This would decrease hunting expenditures by an estimated \$2,550 annually which would impact the local businesses that serve recreationists; however, the regional economy would not be affected significantly. I do not feel the shorter period of hunter days is too restrictive.

Under Enhanced Management, five permittees would have 2,925 acres permitted. On 26,000 acres three vehicle ways with 10.5 miles of length would be closed except for emergency repairs of facilities or livestock emergency such as sickness.

There would be no restrictions on 33,660 acres. Permittees would have use of all facilities as described under No Wilderness but maintenance would have to be in a manner least

|                           |       |
|---------------------------|-------|
| DATE                      | 16 84 |
| ASST. DIR.                | PA    |
| ADMS.                     | SV    |
| PER.                      | MR    |
| OTE                       | MD    |
| JUL 2 1984                |       |
| RECEIVED                  |       |
| BUREAU OF LAND MANAGEMENT |       |
| ACTION                    |       |

impairing to wilderness values on 15 reservoirs, 25.25 miles of fence and 1 spring development. The proposed new developments as described under No Wilderness--Table 2;2--could be an important factor in the decisions by livestock operators to select this alternative in the Bitter Creek Draft Environmental Impact Statement.

My question is how does a rancher operate successfully should a lease holder come in on adjoining public land and begin drilling operations for natural gas a high potential in the Bitter Creek WSA. Polluted air would result as well as contamination of ground water.

Three pre-FLPMA leases of 1,790 acres would be developed with no special restrictions. In the worst case, 25 post-FLPMA leases on 24,210 acres would not be explored or developed. New leases on either pre-or post-FLPMA leases would not be renewed if they expire on the 26,000 acres recommended suitable in this alternative.

There would be no special restrictions and leases would be renewed on the 33,660 acres not recommended for wilderness in this alternative.

**I support these Management Actions.**

I would go along with the present management as prescribed in the Valley Management Framework Plan (MFP) which is the current management situation; local citizens are very satisfied with it and would prefer to have no alternatives.

In view of the proposed Management Actions described in the No Wilderness Alternative, and should Congress decide to accept this alternative, how can the current lifestyle of the community continue? Note the stipulation "All leases can be developed with only standard stipulations with no special restrictions."

I feel the Enhanced Wilderness Manageability Alternative is fair and objective and the 26,000 acres set aside as wilderness, gives a great deal of pleasure to recreationists and a refuge to wildlife, as well.

Thank you for the opportunity to comment on the Bitter Creek WSA.

Sincerely,

Mildred Leonard

45

DISTRICT MGR.  
BLM  
LEWISTOWN, MT.

|                |         |
|----------------|---------|
| SEARCHED       | INDEXED |
| SERIALIZED     | FILED   |
| JUL 13 1984    |         |
| RECEIVED       |         |
| LEWISTOWN, MT. |         |
| ACTION         |         |

MICHAEL COLAVITO  
21 MAPLE AVE.  
CHATTAGUA, NY 10514  
July 6, 1984

RE: BITER CREEK WILDERNESS STUDY

DEAR MR. FREEMAN,

THANK YOU FOR THE COPY OF THE DED.

AS THE NATIONAL WILDERNESS PRESERVATION SYSTEM HAS AS ONE OF ITS PURPOSES THE INTENT TO PRESERVE AS MANY AS POSSIBLE SAMPLES OF EACH TYPE OF ECOSYSTEM IN THE U.S., AND AS THE BITER CREEK TYPE IS HEAVILY REPRESENTED AND SHARING WILL STILL BE AFTER CONGRESSIONAL ACTION ON THE CHARLES RUSSELL REFUGE UNITS, I

THEREFORE FEEL THAT THE UNHARVESTED MANAGEMENT ALTERNATIVE IS THE BEST COMPROMISE THAT ALL OF US CAN LIVE WITH. IT SEEMS TO ME THE LOGICAL CHOICE IF THE BLM CAN REMAIN OBJECTIVE IN THE MATTER IN THE VIEW OF ALL THE LOCAL ATTITUDES.

SINCERELY,  
Michael Colavito

46

|                |         |
|----------------|---------|
| SEARCHED       | INDEXED |
| SERIALIZED     | FILED   |
| JUL 13 1984    |         |
| RECEIVED       |         |
| LEWISTOWN, MT. |         |

420 S. Roberts ..  
Helena, MT 59600  
11 July 1984

William W. Freeman, District Manager BLM  
Airport Road  
Lewistown, MT 59457

Dear Mr. Freeman,

I have reviewed the draft Biter Creek Wilderness E.I.S. (3/84) and believe it is for the public good that there is adequate representation of the various ecotypes in the National Wilderness Preservation System.

I therefore strongly designator of a suitable portion of the Biter Creek WSA even if it is a smaller area than the Enhanced Wilderness Manageability Alternative.

Sincerely,  
George D. Holton

47

B.H.M.  
District Mgr. B.H.M.  
Lewistown, Mt.

Dear Mr. Freeman

|                   |             |
|-------------------|-------------|
| By _____          | S & B _____ |
| ASSOC. Sec. _____ | PA _____    |
| ADMIN. _____      | BYE _____   |
| FILE _____        | MAIL _____  |
| OPS _____         | NOT _____   |

USDH JUL 17 1984

RECEIVED  
LEWISTOWN, MT

ACTION \_\_\_\_\_

Hinsdale, Mt.  
July 10, 1984

Oppose Creation of Bitter Creek Wilderness in  
Park County, Montana.

Some of the reasons are others of your view.

Area is not pristine or isolated and does  
not meet Wilderness requirements.

Area is geographically located away from  
population or usual travel paths so would  
get little use.

Weather is unpleasantly dry and hot in  
summer and cold in winter.

Land is now available for hiking, horse  
back riding, and hunting, none of which  
would be improved by wilderness  
designations.

Government can better spend money on  
improving land than designating  
wilderness and waiting improvements to  
likewise made.

Yours truly,  
Chris E. Black

48



Don Freeman  
District BLM Office  
Lewistown, MT 59451

Dear Sir,

I am opposed to the Bitter Creek  
area being designated for wilderness  
area.

Sincerely,  
Chris E. Black

McCOLLY RANCH, Inc.

P.O. Box 98

Hinsdale, Montana 59241

Phone: Office (408) 364-2214  
Ranch (408) 648-5458

|                   |             |
|-------------------|-------------|
| By _____          | S & B _____ |
| ASSOC. Sec. _____ | PA _____    |
| ADMIN. _____      | BYE _____   |
| FILE _____        | MAIL _____  |
| OPS _____         | NOT _____   |

USDH JUL 17 1984

RECEIVED  
LEWISTOWN, MT

ACTION \_\_\_\_\_

EAT DELICIOUS BEEF - MONTANA BEEF IS BEST

49



McCOLLY RANCH, Inc  
P.O. Box 98  
Hinsdale, Montana 59241

Phone: Office (408) 364-2214  
Ranch (408) 648-5456

|                   |              |
|-------------------|--------------|
| By _____          | L & SR _____ |
| ASSOC. DIR. _____ | SA _____     |
| ADMIN. _____      | EVS _____    |
| FFSA _____        | MM _____     |
| OPS _____         | JUD _____    |
| JUL 17 1984       |              |
| RECEIVED          |              |
| LEWISTOWN, MT     |              |
| ACTION _____      |              |

Glenn Freeman  
District BLM office  
Lewistown, MT.

Dear Sir:

As a former Rancher in the Hinsdale area I support the BLM's decision to exclude the Bitter Creek area from Wilderness designation. I oppose any wilderness designation in eastern Montana.

Concurred  
Jim McCally

EAT DELICIOUS BEEF - MONTANA BEEF IS BEST

50



WESTRUM & ROSENDAHL  
OK HARDWARE

HINSDALE, MONTANA 59241 - PHONE: 364-2342  
July 16, 1984

|                   |              |
|-------------------|--------------|
| By _____          | L & SR _____ |
| ASSOC. DIR. _____ | SA _____     |
| ADMIN. _____      | EVS _____    |
| FFSA _____        | MM _____     |
| OPS _____         | JUD _____    |
| JUL 17 1984       |              |
| RECEIVED          |              |
| LEWISTOWN, MT     |              |
| ACTION _____      |              |

Glenn Freeman

Dist. Mgr. BLM

Lewistown, MT 59457

Dear Sir:

We oppose creation of the Bitter Creek Wilderness in Valley County Montana. This area is not pristine or isolated, the land is now in good condition and the continuation of present use will preserve the resource and we feel the government can better spend money on improving land, than on declaring wilderness and wasting improvements already made.

Yours truly,

John Rosendahl  
Owner Rosendahl

51

Mr. Freeman  
Bitter Manager  
B.L.M.  
Lewistown, Mont.

|                  |       |    |
|------------------|-------|----|
| ON               | 1 & 2 | PP |
| PROD. ON         |       | PP |
| ADMIN.           | ASST. | PP |
| F/TA             |       | PP |
| OFF              |       | PP |
| USDI JUL 19 1984 |       |    |
| RECEIVED         |       |    |
| NEWSPRINT        |       |    |
| ACTION           |       |    |

Mr. Freeman;

I am not in the habit of writing protest letters, this being the first. I do not believe the B.L.M. would be serious about creating Bitter Arch Wilderness in Valley County, of all areas in Montana this is in my opinion one of the most God-far taken areas there is. If you in public employment would spend just half your time thinking up such projects that would have some use to the

population as a whole wouldn't this be a better state? Come on, I'm sure you can find a better place to waste your time and our money than Bitter Arch.

Lang Bennett  
23-41 Virginia  
Billings, Montana



52

Box 131  
 Etchey, Montana 59457  
 July 17, 1984

Glenn Freeman  
 Dist Mgr BLM  
 Lewistown, MT 59457

Dear Mr. Freeman:

I oppose the creation of a Bitter Creek  
 Wilderness in Valley County, Montana. The area  
 is not suitable for such designation, as it  
 is a good location to get my sons and  
 such. Besides, continuation of present law  
 will preserve such resources as there are.

Yours very truly,  
 Leontine Bensch

|               |    |    |
|---------------|----|----|
| DM            | LS | SR |
| ASSOC-DM      | PA |    |
| ADMIN         | BY |    |
| P/FA          | MM |    |
| OPS           | MM |    |
|               | MM |    |
| JUL 19 1984   |    |    |
| RECEIVED      |    |    |
| LEWISTOWN, MT |    |    |
| ACTION        |    |    |

53

Glasgow Clinic, P.S.C.

GLASGOW, MONTANA 59330

July 18, 1984

|               |    |    |
|---------------|----|----|
| DM            | LS | SR |
| ASSOC-DM      | PA |    |
| ADMIN         | BY |    |
| P/FA          | MM |    |
| OPS           | MM |    |
| JUL 19 1984   |    |    |
| RECEIVED      |    |    |
| LEWISTOWN, MT |    |    |
| ACTION        |    |    |

Mr. Glen Freeman  
 BLM District Manager  
 Lewistown, Montana 59457

Dear Mr. Freeman:

Please leave Bittercreek area alone. Do not designate  
 as wilderness.

Sincerely,

David Gregory

David Gregory, M.D.

DG:nje

54

Mr. Glenn Freeman  
District Manager, BLM  
Drawer 1160  
Lewistown, Montana 59457

Dear Sir:

I am writing to endorse BLM's preferred alternative of "no wilderness" for the Bittercreek area.

I am familiar with this area and do not feel that it meets criteria for wilderness designation.

TON HICKMAN, 717 - 6th Ave. North, Glasgow, Mt. 59230

|                           |       |        |       |
|---------------------------|-------|--------|-------|
| DM                        | _____ | L & SE | _____ |
| ASSOC-DM                  | _____ | FA     | _____ |
| ASST-DM                   | _____ | WFO    | _____ |
| F/EA                      | _____ | MM     | _____ |
| CPE                       | _____ | POD    | _____ |
| USDI JUL 19 1984 BLM      |       |        |       |
| RECEIVED<br>LEWISTOWN, MT |       |        |       |
| ACTION _____              |       |        |       |

Thank you, *Glenn*  
Name & address

55

Handed, Mont  
July 17, 1984

Glenn Freeman  
Dist Mgr BLM  
Lewistown, Mont.

|                           |       |        |       |
|---------------------------|-------|--------|-------|
| DM                        | _____ | L & SE | _____ |
| ASSOC-DM                  | _____ | FA     | _____ |
| ASST-DM                   | _____ | WFO    | _____ |
| F/EA                      | _____ | MM     | _____ |
| CPE                       | _____ | POD    | _____ |
| USDI JUL 19 1984 BLM      |       |        |       |
| RECEIVED<br>LEWISTOWN, MT |       |        |       |
| ACTION _____              |       |        |       |

Dear Mr. Freeman,

I would like to go on record as opposing any wilderness area in valley color for that matter any area in the United States which is currently used as taxable land and producing revenue for counties as well as providing a living for cattle ranchers, logging industries etc. If the government wants to spend money let's spend it for some practical use, such as poisoning gophers building game fences irrigation projects power projects. The list is endless. As far as hunting packing & other recreational use this land is here now and can be used as is where is. However lots of trees & lakes & lots of mosquitos no one ever will use it as is or as a wilderness, so why consider spending money on something no one will ever use anyway.

Yours truly,  
Jesse Lacroix

56

|                                |             |
|--------------------------------|-------------|
| DATE                           | 10 19       |
| APPROVED                       | PA          |
| ADMIN                          | BY          |
| F/EA                           | DATE        |
| OPS                            | TIME        |
| USE                            | JUL 19 1984 |
| RECEIVED                       |             |
| U.S. DEPARTMENT OF AGRICULTURE |             |
| ACTION                         |             |

Dear Sir,

I oppose Creation of Bitter Creek Wilderness in Blaine County, Montana. Brothers are sons of the reason. It would put some families out of work including Wynne & My 2 sons.

I do not believe the area needs wilderness representation. It is an unpleasantly dry, hot in summer & cold in winter.

The land is available for hiking - camping - hunting & rock hunting so I don't think wilderness would be a benefit. The land is in good condition & the continuation of land will preserve the same.

Thank you  
James B. McFarland  
Box 133  
Hinsdale, Mt 59541

57

Hinsdale, Mt 59541  
July 17, 1981

Dear Mr. Freeman,

I wish to go on record as opposing the creation of the Bitter Creek Wilderness. The reasons are many but the main one is that I just don't see as the people who would see the Wilderness for solitude, horse back riding, cross country skiing or whatever can't do it and it be used as grazing. I doubt that very few people wish to feed the Montana mosquitoes or face the summer heat or winter cold.

I feel we have enough Montana land set aside for the use of a few at the cost of grass to the many whom land is left available for multiple use, the minerals, grass, water and scenery can be utilized for the good of all.

Sincerely yours,

Edwin T. McCarty

|                                |             |
|--------------------------------|-------------|
| DATE                           | 10 19       |
| APPROVED                       | PA          |
| ADMIN                          | BY          |
| F/EA                           | DATE        |
| OPS                            | TIME        |
| USE                            | JUL 19 1984 |
| RECEIVED                       |             |
| U.S. DEPARTMENT OF AGRICULTURE |             |
| ACTION                         |             |

Glen Freeman  
Dist Mgr. BLM  
Leicester, Mont

Sir

I am opposed to the Better Creek  
Wilderness area. When you have  
something that works leave it alone!

Mabel Nelson  
Box 427  
Unadilla Mont 59241

July 18 1984

|                     |       |
|---------------------|-------|
| DR                  | T & H |
| ASSOC. RM           | PA    |
| ADMIN               | BYE   |
| PRSA                | IMP   |
| OPS                 | JUD   |
| VER JUL 19 1984 BLM |       |
| RECEIVED            |       |
| LEWISBORO, MT       |       |
| ACTION              |       |

Unadilla, Mt.  
July 18, 1984

Mr. Glen Freeman  
Dist Mgr. BLM  
Leicester, Mt. 59457

|                     |       |
|---------------------|-------|
| DR                  | T & H |
| ASSOC. RM           | PA    |
| ADMIN               | BYE   |
| PRSA                | IMP   |
| OPS                 | JUD   |
| VER JUL 19 1984 BLM |       |
| RECEIVED            |       |
| LEWISBORO, MT       |       |
| ACTION              |       |

Dear Sir:

I am writing this letter to oppose the  
Better Creek Wilderness proposal. I am quite familiar  
with this area, and feel if it is left alone it  
will always be like it is now. It is really nothing  
but a hole in the ground and not very attractive  
for recreation purposes. It serves some purpose now  
for a little grazing and hunting of deer &  
antelope. Let's leave it like it is and  
not call any more attention to it.

Yours Truly  
Mabel Nelson  
Unadilla, Mt. 59241

7/16/84

Mr. Glenn Freeman  
District Mgr., BLM  
Drawer 1160  
Lewistown, Montana 59457

Dear Sir:

The purpose of this letter is to advise that I am in agreement with BLM's recommendation of "no wilderness" in the Bittercreek area. Having hunted the area for several years it is my feeling that wilderness designation would not be warranted.

Sincerely,

*Kenneth L. Newton*  
Kenneth L. Newton  
1124 Valley View  
Glasgow, Montana 59230

|               |         |
|---------------|---------|
| SEARCHED      | INDEXED |
| SERIALIZED    | FILED   |
| JUL 19 1984   |         |
| RECEIVED      |         |
| LEWISTOWN, MT |         |
| ACTION        |         |

Mr. Glenn Freeman  
District Manager BLM  
Drawer 1160  
Lewistown, Mt. 59456

Dear Mr. Freeman:

Please record me as being opposed to wilderness designation for the Bittercreek area. BLM has correctly concluded that this area should not be wilderness.

My conclusions come as the result of having been familiar with the area in question over many years.

|               |         |
|---------------|---------|
| SEARCHED      | INDEXED |
| SERIALIZED    | FILED   |
| JUL 19 1984   |         |
| RECEIVED      |         |
| LEWISTOWN, MT |         |
| ACTION        |         |

Sincerely,

*Kenneth L. Newton*  
Name and address.  
*Kenneth L. Newton*  
Box 312  
Glasgow Mt. 59230



62

Mr. Glenn Freeman  
District Manager, BLH  
Drawer 1160  
Lewistown, Montana 59457

Dear Sir:

The purpose of this letter is to advise that I am in agreement with BLH's recommendation of "no wilderness" in the Bittercreek area. Having hunted the area off several years I my feeling that wilderness design would not be warranted.

Sincerely,  
Terry Pender  
Name and address  
1635 Highway 9 W 59466  
Glasgow, MT 59220

|             |      |
|-------------|------|
| TO          | DATE |
| ASSOC-DR    | PA   |
| ADMINL      | BY   |
| PTA         | HR   |
| OPS         | JUD  |
| JUL 19 1984 |      |
| BLH         |      |

63

Glenn Freeman  
July 18, 1984

Mr. Glenn Freeman  
District Mgr. BLH  
Lewistown, Mont. 59457

I am opposed to creating a wilderness area in Montana. The millions of dollars spent to create this area could be used for other things. One solution for this money would be to limit the trapping people in the United States. President Reagan doesn't think there are any trapping people in the United States but he doesn't take a hint the poor people who are taking out a few animals are the sick.

|               |      |
|---------------|------|
| TO            | DATE |
| ASSOC-DR      | PA   |
| ADMINL        | BY   |
| PTA           | HR   |
| OPS           | JUD  |
| JUL 19 1984   |      |
| BLH           |      |
| RECEIVED      |      |
| LEWISTOWN, MT |      |
| ACTION        |      |

Glenn Freeman  
Lewistown

68

|               |      |
|---------------|------|
| TO            | FROM |
| ASSOC. DIR.   | PA   |
| ADMIN.        | ENV. |
| PLA.          | MAN. |
| OPS.          | JUD. |
| JUL 20 1984   |      |
| RECEIVED      |      |
| LEWISTOWN, MT |      |
| ACTION        |      |

OLEN FREEMAN  
DISTRICT MANAGER R.L.M.  
LEWISTOWN, MONTANA 59457

DEAR SIR:

I am writing to you in reference to the BITTER CREEK WILDERNESS AREA which is being considered for Valley County, Montana. I am in opposition to the creation of this wilderness area.

I am opposed to this plan for the following reasons:

The land under consideration is now in good condition and the continuation of present use will preserve its value.

The government would be better served if the monies to be used for this wilderness area were spent on the improvement of land which is presently in need of it.

The weather in the area is not conducive to casual outdoor sports.

The area is located far away from population centers and public transportation and therefore would get little use.

For those few hardy souls who wish to hike, hunt, take pictures or collect rocks the use of this land is already available.

This land does not meet the wilderness requirements as originally set forth.

Please take my feelings on this matter into account when it comes up for a decision. I've lived in this area all of my life and I know that the area would not be used any more than it is presently. In my opinion the creation of a wilderness area in the Bitter Creek region would be detrimental to the surrounding area.

Sincerely,

*Anna G. Berge*  
Anna G. Berge

POB 192  
HINSDALE, MONTANA 59241  
JULY 18, 1984

69

|               |      |
|---------------|------|
| TO            | FROM |
| ASSOC. DIR.   | PA   |
| ADMIN.        | ENV. |
| PLA.          | MAN. |
| OPS.          | JUD. |
| JUL 20 1984   |      |
| RECEIVED      |      |
| LEWISTOWN, MT |      |
| ACTION        |      |

*Hinsdale Mont.*  
*July 14 1984*

*Mr. Olen Freeman*  
*Dist. Mgr. B.L.M.*  
*Lewistown Mont.*  
*59457*

*Dear Mr. Freeman:*

*I don't see why the Bitter Creek Wilderness*  
*can not just be forgotten. Any one who would like*  
*to back pack thru there would be lucky. I think that*  
*area is being used to the best advantage. No way if not*  
*lets use a little common sense about some of these things.*  
*There has been a lot of opposition to this long people with*  
*like in this area. I saw the horse tracks come, like*  
*40 years. Pick rock & lay them in the mountains, and that*  
*is terrible today. I have traveled the roads with a wheelbarrow,*  
*and even crossed it on bare back.*  
*I have said you lot with them who oppose the matter.*

*Sincerely*  
*Anna G. Berge*

70

|               |       |       |       |
|---------------|-------|-------|-------|
| DIR           | _____ | 1 & 2 | _____ |
| ASSOC. DIR.   | _____ | PA    | _____ |
| ADMIN.        | _____ | BYE   | _____ |
| PLA           | _____ | IMP   | _____ |
| OPS           | _____ | IMP   | _____ |
| JUL 20 1984   |       |       |       |
| RECEIVED      |       |       |       |
| LEWISTOWN, MT |       |       |       |
| ACTION        |       |       |       |

July 19, 1984

Dear Mr. Freeman,

I support the recommendation of the BLM that no part of the Bitter Creek be designated as wilderness.

Very truly yours,  
*G. G. Freeman*

71

|               |       |       |       |
|---------------|-------|-------|-------|
| DIR           | _____ | 1 & 2 | _____ |
| ASSOC. DIR.   | _____ | PA    | _____ |
| ADMIN.        | _____ | BYE   | _____ |
| PLA           | _____ | IMP   | _____ |
| OPS           | _____ | IMP   | _____ |
| JUL 20 1984   |       |       |       |
| RECEIVED      |       |       |       |
| LEWISTOWN, MT |       |       |       |
| ACTION        |       |       |       |

July 19, 1984

Dear Mr. Freeman,

I support the recommendation of the BLM that no part of the Bitter Creek be designated as wilderness.

Very truly yours,  
*May St. John*

72

|               |       |       |       |
|---------------|-------|-------|-------|
| DIR           | _____ | 1 & 2 | _____ |
| ASSOC. DIR.   | _____ | PA    | _____ |
| ADMIN.        | _____ | BYE   | _____ |
| PLA           | _____ | IMP   | _____ |
| OPS           | _____ | IMP   | _____ |
| JUN 18 1984   |       |       |       |
| RECEIVED      |       |       |       |
| LEWISTOWN, MT |       |       |       |
| ACTION        |       |       |       |

Mr. Glenn Freeman,  
 District Manager  
 Bureau of Land Management  
 Airport Road  
 Lewistown, MT 59457

Dear Mr. Freeman,

I would like to express my support for Alternative #3 for the BITTER CREEK EAST WILDERNESS.

The addition of this prairie wilderness to the National Wilderness system would add to the diversity of the system. One needs only to look at a recent map of Montana and the great plains to see how little roadless stress we have anymore. The BLM's review of the Bitter Creek Wilderness Study Area should reconsider the compromise alternative which mitigates potential conflicts in the area.

Please place me on our distribution list for additional wilderness studies in the Lewistown region. As a native Montanan, I am quite concerned with the preservation of the wildlands in our great state.

Sincerely,

*Tom Wilde* 6-13-84  
 Thomas Wilde  
 1200 Galepage, Unit 419  
 Denver, CO 80204

73

|               |            |
|---------------|------------|
| TO:           | U.S. DEPT. |
| ASSOC. DIR.   | PA         |
| ADMIN.        | OPS        |
| PLA           | ADN        |
| OPS           | REC        |
| JUL 20 1984   |            |
| RECEIVED      |            |
| LEWISTOWN, MT |            |
| ACTION        |            |

July 18, 1984

Glenn V. Freeman  
BLM District Manager  
Lewistown, Montana 59457

Dear Sir:

We support the recommendation of the BLM, that no part of the Bitter Creek and Charles M. Russell Wildlife Refuge be designated as wilderness lands.

Sincerely,

*Mark Lane*  
Mark Lane  
Member, Pines Association

(eleven additional - identical comments)  
(were received)

74

G.O. Box 898  
Lewistown, Mont. 59457  
July 19, 1984

|               |            |
|---------------|------------|
| TO:           | U.S. DEPT. |
| ASSOC. DIR.   | PA         |
| ADMIN.        | OPS        |
| PLA           | ADN        |
| OPS           | REC        |
| JUL 20 1984   |            |
| RECEIVED      |            |
| LEWISTOWN, MT |            |
| ACTION        |            |

Mr. Glenn Freeman  
District Manager  
Bureau of Land Management  
Lewistown, Montana 59457

Dear Mr. Freeman:

As a native of the Hinsdale Area in Valley County I oppose the creation of the proposed Bitter Creek Wilderness Area.

I cannot understand how such an area that has been homesteaded, fields cleared of rocks, farmed and improved by the construction of buildings can possibly meet the requirements of a wilderness area. I think the proposal is absurd and hope you will do whatever you can to prevent its creation.

Sincerely,  
J. C. McColly

Helena, Montana  
July 15, 1984

Mr. David Freeman  
District Manager, BLM  
Lewistown, MT 59457

|                           |       |
|---------------------------|-------|
| RM                        | 1 & 2 |
| ASSOC. DIR.               | PA    |
| ADMIN.                    | EVE   |
| PLA                       | WH    |
| CPS                       | AUD   |
| JUL 20 1984 RM            |       |
| RECEIVED<br>LEWISTOWN, MT |       |
| ACTION                    |       |

Dear Mr. Freeman:

I am definitely opposed to the creation of Bitter Creek Wilderness. I have lived in Valley County most of my life and am familiar with the area.

This isolated area is certainly not suitable and does not need the qualifications for such an area as far as I am concerned.

Please do all in your power to prevent the creation of Bitter Creek Wilderness.

Sincerely,

Ann M. Dinsley

|                           |       |
|---------------------------|-------|
| RM                        | 1 & 2 |
| ASSOC. DIR.               | PA    |
| ADMIN.                    | EVE   |
| PLA                       | WH    |
| CPS                       | AUD   |
| JUL 20 1984 RM            |       |
| RECEIVED<br>LEWISTOWN, MT |       |
| ACTION                    |       |

July 17, 1984  
Friedberg, Mont.  
59241

Glen Freeman  
Dist. Mgr. B.S.M.  
Lewistown Mont 59457

Dear Sirs—

I can see no good reason that Bitter Creek should be created as a wilderness area, in Valley Co.

I have been over this area several times and can not show anyone who'd go out of their way to visit this area. As summers are hot and dry, and winters are sometimes severe and dangerous to one not familiar with this country. Seems that taxpayers money would be better spent than to spend

Several Years Studying this thing,  
then to find that the local  
people are opposed to it and  
very few people in favor.

Sincerely  
Audrey A. Simonsen  
Box 128  
Hinsdale, Mont  
59241

(77)

Bpx 236

Hinsdale, Mt. 59241

JUNE 19, 1984

|   |    |
|---|----|
| ASSOC. DIR.                               | SA |
| ADMIN.                                    | SA |
| FILE                                      | SA |
| OPS                                       | SA |
| RECEIVED<br>JUL 20 1984<br>LEWISTOWN, MT. |    |
| ACTION                                    |    |

GLEN FREEMAN, DIST. MGR.  
BUREAU OF LAND MANAGEMENT  
LEWISTOWN, MT. 59457

I NEVER TOOK THE TIME PREVIOUSLY TO  
REGISTER MY OPPOSITION TO DESIGNATION  
OF BITTER CREEK AREA AS WILDERNESS,

BUT, HAVING LIVED & HUNTED BIRDS AND  
BIG GAME IN THIS AREA FOR OVER 40  
YEARS, IT IS INCOMPREHENSIBLE TO  
ME HOW THE B.L.M. CAN GIVE

ANY WEIGHT TO OPINIONS IN  
SUPPORT OF THIS FROM INDIVIDUALS  
IN OTHER STATES, HUNDREDS OR  
THOUSANDS OF MILES AWAY, WHO  
HARDLY KNOW WHERE MONTANA IS,  
LET ALONE WHERE THIS INSIGNIFICANT  
PIECE OF LAND IS IN THE WHOLE STATE.

YOUR SURVEY OUGHT TO BE  
RESTRICTED TO THE PEOPLE  
AFFECTED

*Pat Williams*



78

James Hansen  
HCR 271-1110  
Glasgow, MT 59201  
July 19, 84

Glenis Freeman  
BLM District Manager  
Lewisstown, MT 59457

Dear Glenis,  
I Support the BLM recom-  
mendation that no part of  
the Bitter Creek be design-  
ated as Wilderness

Thank you,  
James R. Hansen

|                           |             |    |     |
|---------------------------|-------------|----|-----|
| DATE                      | JUL 23 1984 | BY | BLM |
| ASSOC. DIR.               | PA          |    |     |
| ADMIN.                    | BY          |    |     |
| FILE                      | BY          |    |     |
| DATE                      | JUL         |    |     |
| RECEIVED<br>LEWISTOWN, MT |             |    |     |
| ACTION                    |             |    |     |

79

Box 367  
Hinsdale, MT 59457

|                           |             |    |     |
|---------------------------|-------------|----|-----|
| DATE                      | JUL 23 1984 | BY | BLM |
| ASSOC. DIR.               | PA          |    |     |
| ADMIN.                    | BY          |    |     |
| FILE                      | BY          |    |     |
| DATE                      | JUL         |    |     |
| RECEIVED<br>LEWISTOWN, MT |             |    |     |
| ACTION                    |             |    |     |

Mr. Glen Freeman  
Dist. Mgr., BLM  
Lewisstown, MT 59457

Dear Mr. Freeman:

I am strongly opposed to the  
creation of the proposed Bitterschick Wilderness  
area in Valley County.

I cannot think of a single  
reason for setting aside this area for wilderness  
and could give many reasons against this.

I do not think there is a  
single place where there is any slide in the  
area and any hike would be in danger  
of run slides in the summer. I do not know  
of a single thing in the area that would  
warrant such a hike in the first place.  
Under the multiple use program, the area  
is earning money for the BLM program.  
In the wilderness most of this money  
would either be lost or greatly reduced  
as far as power there is no decent drinking  
water in the area so there is no inducement  
for backpacking campers there are hundreds  
of places in this state that are far better  
than this area

Sincerely  
Andrew B. Hellestar

July 19, 1984

Dear Mr. Freeman,

We support the BLM's decision to exclude the Bittercreek area from wilderness designation. We feel that enough time and money has been spent on this already and it is time to put it to rest.

*Dwayne Johnson*  
Dwayne Judith Johnson  
Hinsdale, Mt. 59241

|                 |       |
|-----------------|-------|
| DM              | 1 & 2 |
| ASIOC-DM        | PA    |
| ADMIN           | PV    |
| P/EA            | RM    |
| CPE             | RD    |
| JUL 23 1984 BLM |       |
| RECEIVED        |       |
| LEWISTOWN, MT   |       |
| ACTION          |       |

|                 |       |
|-----------------|-------|
| DM              | 1 & 2 |
| ASIOC-DM        | PA    |
| ADMIN           | PV    |
| P/EA            | RM    |
| CPE             | RD    |
| JUL 23 1984 BLM |       |
| RECEIVED        |       |
| LEWISTOWN, MT   |       |
| ACTION          |       |

*to whom it may concern.*

*I support the BLM's decision to exclude the Bitter Creek area from wilderness designation. It is certainly not wilderness material.*

*Sincerely,*

*Michael Johnson*  
*Hinsdale, MT*

(82)

Wm. Freeman  
 Dist. Mgr. BLM  
 Livingston, Mont.

|                               |             |    |    |
|-------------------------------|-------------|----|----|
| DATE                          | JUL 23 1984 | BY | BA |
| ASSOC. DIR.                   | PA          |    |    |
| ADMIN.                        | WFA         |    |    |
| OPS                           | WFA         |    |    |
| RECEIVED<br>BLM WILDERNESS MT |             |    |    |
| ACTION                        |             |    |    |

July 20, 1984

Wm. Freeman

This letter is to let you know that I am opposed to the creation of "Bitter Creek Wilderness" in Valley County, Montana.

And I feel that I can safely say that anyone that knows that area is opposed to it too.

The present use of the area will keep them land in good condition and preserve it as a good resource.

And Montana has many designated Wilderness areas which are suitable to be used as such.

Sincerely,

Edward H. McCally

(83)

Wm. Freeman,

July 20, 1984

I am opposed to the Bitter Creek Wilderness in Valley Co. MT.

The weather is hot & dry in summer & cold in winter.

John Melby  
 Shoshone, MT.

|                               |             |    |    |
|-------------------------------|-------------|----|----|
| DATE                          | JUL 23 1984 | BY | BA |
| ASSOC. DIR.                   | PA          |    |    |
| ADMIN.                        | WFA         |    |    |
| OPS                           | WFA         |    |    |
| RECEIVED<br>BLM WILDERNESS MT |             |    |    |
| ACTION                        |             |    |    |

84

MOGAN RANCH, INC.  
LAND AND LIVESTOCK  
POST OFFICE BOX 547  
LEWISTOWN, MONTANA 59457  
PHONE 366-9340

July 19, 1984

Mr. Glen Freeman  
District Manager  
Bureau of Land Management  
Lewistown, Montana 59457

Dear Mr. Freeman:

I oppose creation of Bitter Creek Wilderness in Valley County, Montana. Some of my reasons for this are as follows:

- 1) The area is not pristine or isolated and does not meet wilderness requirements.
- 2) The area is geographically located away from population or usual travel paths so would get little use.
- 3) Weather is unpleasantly dry and hot in summer and cold in winter.
- 4) The land is now available for hiking, rock hounding, and hunting, none of which would be improved by wilderness designation.
- 5) Government can better spend money on improving land, than declaring wilderness and wasting improvements already made.

The land is currently in good condition and the continuation of present use will preserve the resource.

I urge you to consider each of the above points individually and also collectively.

Sincerely,

Alex B. Mogan

ABM:bd

|                                 |      |    |
|---------------------------------|------|----|
| TO                              | DATE | BY |
| ASSOC. DIR.                     | PA   |    |
| ADMIN.                          | BY   |    |
| PLA                             | BY   |    |
| OFF                             | BY   |    |
| JUL 23 1984                     |      |    |
| RECEIVED                        |      |    |
| U.S. DEPARTMENT OF THE INTERIOR |      |    |
| BUREAU OF LAND MANAGEMENT       |      |    |
| LEWISTOWN, MONTANA              |      |    |

85

17 July 1984

Mr. Glenn Freeman  
District Manager  
Bureau of Land Management  
Lewistown, Montana 59457

Dear Mr. Freeman,

I'm writing this letter in opposition to the proposed Bittercreek Wilderness Area in Valley County, Montana. There are three reasons for my opposition. The area is located in Northeast Montana to which basically nobody travels; it is unpleasantly hot in the summer and extremely cold in the winter, which further deters the public from wanting to utilize the area. The area is presently being well taken care of and the public presently can hunt, or use their motor vehicles within it's boundaries.

For the above reasons, I oppose the proposed Bittercreek Wilderness area.

Sincerely,

*N. H. Patrick*  
N. H. Patrick

(twenty two additional - identical comments)  
were received

|                                 |      |    |
|---------------------------------|------|----|
| TO                              | DATE | BY |
| ASSOC. DIR.                     | PA   |    |
| ADMIN.                          | BY   |    |
| PLA                             | BY   |    |
| OFF                             | BY   |    |
| JUL 23 1984                     |      |    |
| RECEIVED                        |      |    |
| U.S. DEPARTMENT OF THE INTERIOR |      |    |
| BUREAU OF LAND MANAGEMENT       |      |    |
| LEWISTOWN, MONTANA              |      |    |



## TRANSCRIPTS

Glasgow

Mr. Connell

- A. Bitter Creek East is just one of several alternatives analyzed and is not a recommendation. The proposed action is that none of the WSA be designated as wilderness.
- B. The reference to the gray wolf has been deleted from the EIS as it was not included on the list of threatened and endangered species provided by the U.S. Fish and Wildlife Service.

Helena

Neil Rosetta

- A. See Response A to Letter 30.

Gene Etchart

- A. See Connell Response B; Glasgow Hearings.
- B. Black-footed ferret habitat is present in the WSA and the U.S. Fish and Wildlife Service listed the black-footed ferret as a possible threatened and endangered species in the WSA.
- C. The Bitter Creek WSA falls into the Great Plains Shortgrass Prairie Ecoregion. The WSA actually contains a mixture of grass types including prairie shortgrasses.

Bill Cunningham

- A. Based on use figures provided the BLM from the U.S. Fish and Wildlife Service on the nearby UL Bend wilderness, there is no evidence to suggest an increase in recreational use of Bitter Creek if designated as wilderness.
- B. Opportunity for guided hunts in Bitter Creek has always existed but there has never been any formal interest in outfitting in this area.
- C. See Response A to Letter 30.
- D. The U.S. Fish and Wildlife Service did not list the gray wolf as a possible threatened or endangered species in the Bitter Creek WSA.
- E. There are presently two designated wilderness areas in eastern Montana with 15 additional areas Presidentially endorsed and awaiting Congressional action. In addition the BLM has preliminarily recommended 5 areas for wilderness.

While there are several remaining opportunities to preserve examples of eastern Montana grasslands as wilderness, there is little indication there is a demand for this type of wilderness opportunity from the local population of Glasgow and other nearby towns. Approximately 99% of the comments received on the Bitter Creek study indicated no need or desire for eastern Montana wilderness.

- F. The BLM feels that the estimated additional costs to permittees is not exaggerated or inconsistent with BLM policy. The grazing guidelines referred to allow vehicle access for certain maintenance and/or when heavy equipment is required. As stated in Appendix 4.1 of the EIS, some motor vehicle use on vehicle ways would be allowed under wilderness designation. However, casual vehicle use to check cows, water, fences, etc. would not be allowed.

The methodology used to access ranch related economic impacts is given in Appendix 4.1 of the EIS. The ranch related economic impacts assess the additional cost incurred to check cows and fences on horseback versus vehicle use. Costs of hauling animals on and off allotments, major maintenance or emergency situations are not included in the estimates. Under the All Wilderness Alternative additional annual expenses and labor would amount to \$530 and 640 hours. This would be split among six ranch operations or an average of \$88 per operation and 107 hours per operation. The range in potential loss in ranch loan value by alternative is given in Appendix 4.2.



- G. Wilderness is a multiple use of the public lands and any reference that alluded that it was not has been corrected in the EIS.

Mr. Stults

- A. It is true that one of the intents of the Wilderness Act was to preserve a variety of ecosystems. In the case of Bitter Creek, the EIS identified that while the Great Plains Prairie Ecoregion, gramma-needlegrass-wheatgrass subgroup was not broadly represented in the system, Bitter Creek would not be the last opportunity to increase the acreage and variety of this subgroup. See Response A to Letter 30.

#### Response to Letter 1

- A. If the area were designated wilderness, there would be no reductions or increases in grazing preference for permittees authorized to graze livestock within the WSA. Current stocking levels are considered a "grandfather" right of the permittee, strictly speaking from the standpoint of wilderness designation. For this reason, all the wilderness alternatives assumed a continuation of existing stock levels while determining the environmental impacts of wilderness designation or nondesignation. An alternative which addresses reduced grazing preference is outside the scope of this EIS. The discussion of new livestock facilities to manipulate the existing stocking levels is important in the analysis, however, new improvements are not considered a pre-existing use and may impact wilderness or other resource values.

The EIS references trampling and overutilization of vegetation along the bench tops and scarp in Southfork Bitter Creek Allotment No. 4054. This overutilization problem can be taken care of through redistribution of the existing herd through development of water sources without a reduction in grazing preference. The range is still in good ecological range condition and the overuse problem is not considered critical at this time. If the water sources are not developed, the overuse problem can be addressed through a future planning effort.

#### Response to Letter 2

- A. The process for evaluating activities to determine if they would impair wilderness values is described on page 18 of the BLM's Interim Management Policy and Guidelines for Lands Under Wilderness Review, U.S. Department of Interior, December 12, 1979.

#### Responses to Letter 8

- A. There have been some attempts to acquire county-owned lands in or adjacent to the WSA. The county has stated that until the wilderness issue is settled they have no interest in exchange. The State of Montana has indicated a desire to exchange lands in areas that are eventually designated as wilderness. This wilderness study has identified those lands which are within the WSA. If designated, the state would probably trade the state sections.
- B. The EIS assessed the potential for natural gas development as high throughout the WSA. Market conditions will effect if and when exploration occurs on the leases. There is a possibility that all pre-FLPMA leases will expire prior to any exploration.
- C. The increased percentage of "older animals" in the Bitter Creek mule deer herd is only a secondary concern. It will take some years for the population makeup of the herds to change. Previous to this change to an older age class, an increase in deer numbers, past the carrying capacity of the habitat, will occur. The subsequent degradation of this prime mule deer habitat, with the probable lowering of its carrying capacity is our primary concern, and is what we wish to avoid. The ideal herd structure parameters include an age structure which represents the spectrum of age classes. So, it is not as important to have a "young" herd, as it is to have a healthy herd.

In this area the most common incentive for increased harvest is to let more permits or multiple permits. Under past game management in Bitter Creek, the deer population remained high even with no off-road vehicle restriction. With restricted access, i.e., wilderness designation, the problem becomes that of achieving an adequate harvest in the core of the unit. The male mule deer probably would attract enough hunter interest to provide interior harvest, but the typical Valley County mule deer hunter would not walk into Bitter Creek to harvest antlerless deer. Antlerless deer can be obtained easier in other portions of the county where there are no restrictions to off-road travel. Therefore, multiple permits would probably not attract additional hunters. Another problem in obtaining additional harvest is the lack of people in the area.

- D. See Response A to Letter 30.

#### Responses to Letter 9

- A. The state's hunting regulations may not always respond to site specific overpopulation problems. There are few does harvested in the core area of Bitter Creek because of its remoteness and because the deer are available in easier to hunt areas.
- B. The proposed action is not to eliminate wilderness values but rather to allow existing uses to continue. The area has been able to maintain wilderness values while permitted for livestock and open to oil and gas exploration. Grazing would continue in Bitter Creek at or near existing levels with or without wilderness designation.

- C. See Response A to Letter 30.
- D. Range management costs for the Bitter Creek WSA are estimated at \$13,600 annually.
- E. Bitter Creek has high potential for natural gas. In addition, there are excellent opportunities to improve the vegetation resource through implementation of allotment management plans. While recreational use is low, those who do utilize the area rely on the primitive vehicle ways for access. There is no evidence that existing levels of use are placing undue stress on wildlife, or that this level of stress would be alleviated by wilderness designation. The reference to monitoring effort and cost has been deleted from the Environmental Consequences chapter as they are not environmental issues.

#### Responses to Letter 14

- A. Off-road vehicle use is estimated at 450 visits annually. This is considered a low level of use and is not significantly impacting other resource values at this time. Unanticipated increases would be analyzed in later planning efforts or as needed to determine if closures were warranted to prevent resource damage.
- B. No specific predation problem exists in Bitter Creek at this time. There are no proposals for any type of predator control.

#### Responses to Letter 15

- A. It is true that range improvements cannot be used as the sole justification for a nonsuitable recommendation of a roadless area. The degree of impact on the overall apparent naturalness of a WSA is one of a number of considerations in determining suitability. While BLM policy would allow the use of vehicles to maintain facilities, the degree and regularity of such maintenance is a valid consideration in a wilderness study.
- B. New facilities would be allowed only if, considered alone or cumulatively, the project does not affect the apparent naturalness of the area.
- C. Past experience does not support this for Bitter Creek. The opportunity to guide and pack for hunters already exists in the WSA.

In the nearby UL Bend wilderness, designation did not result in a substantial increase of out of state hunters and no outfitters have established guide services in the area.

- D. See revisions in Summary.
- E. The marginal costs of wilderness and other resource management, some of which were estimated in the draft EIS, have been deleted from the final EIS as they are not a valid environmental considerations on the suitability of Bitter Creek as wilderness.

#### Responses to Letter 17

- A. Appendix 3.3 is a copy of correspondence with the U.S. Fish and Wildlife Service on possible threatened and endangered species which occur or could occur in the WSA. The gray wolf is not identified on this list and reference to the gray wolf has been deleted from the text of the final EIS. There is no official proposal to reintroduce wolves into the Bitter Creek WSA area.
- B. See Response A to Letter 30.
- C. The designation of Bitter Creek as wilderness would displace 450 visitors using vehicles within the WSA.

#### Responses to Letter 20

- A. See Response A to Letter 17.
- B. Currently hunting use is primarily along or near the boundaries of the three roadless segments (Bitter Creek South, Bitter Creek West and Bitter Creek East) where ORV access is available with current roads. The conclusion that hunting revenues would decrease is based on current use of the area by hunters who primarily use vehicles to

retrieve game and the closure of ORV traffic with wilderness designation. It is assumed that some hunting would continue on horseback or by hiking but would not increase since these opportunities already exist in other areas within the WSA. It is extremely difficult to compare the opportunities for establishing successful hunting outfitting operations between Bitter Creek and the Bob Marshall area. The Bob Marshall area was a popular hunting area and professionally outfitted in advance of wilderness designation. Bitter Creek has no history of outfitting and is a small, open area when compared to the Bob Marshall and other heavily outfitted areas. This WSA is probably incapable of supporting significant commercial hunting operations.

#### Response to Letters 30, 31, 32, 34, 35, 41, 42, 45, 72

- A. Ecosystem representation was one of a number of considerations made in the selection of the proposed action of no wilderness. The EIS on page 28, states that Bitter Creek is within the gramma-wheatgrass-needlegrass subgroup of the Great Plains shortgrass prairie ecoregion. The Great Plains ecoregion is extensive and contains 9.6% of the nation's lands. The majority of central and eastern Montana fall into the gramma-wheatgrass-needlegrass-subgroup. Included in this gramma-wheatgrass-needlegrass-subgroup are approximately 170,000 undisturbed acres in the Charles M. Russell National Wildlife Refuge presently being administratively managed as wilderness while awaiting Congressional action on wilderness designation. Five BLM wilderness study areas in the Missouri Breaks of eastern and central Montana have been preliminarily recommended as suitable for wilderness and are being managed to preserve natural ecological values similar to those of Bitter Creek. Therefore in the analysis of Bitter Creek's ecological values, the BLM did not consider a nonsuitable recommendation as the last opportunity for designation of examples of the prairie ecotype.

A key consideration in the nonsuitable recommendation was that continuation of existing management would not significantly alter the ecological condition or balance in Bitter Creek. Grazing is proposed to continue at levels that have existed for many years. Natural gas development is a threat to the natural condition of Bitter Creek but full field development is not expected. The normal spacing for gas wells, if the area was totally developed, would place one well per section. Some wilderness values would be lost or diminished but natural ecological processes are not expected to be changed significantly. There is no proposal to allow any of the Bitter Creek lands to be plowed and/or seeded in non-native vegetation.

The EIS has documented the fact that while Bitter Creek appears natural, it is not totally unimpaired. The area has been grazed extensively by domestic livestock for over 50 years. Native grasses have been invaded by club moss, noxious weeds and some crested wheatgrass. Several roads and many reservoirs have been constructed in the area over the years. These activities would continue to some degree with or without wilderness designation with little additional impact on the ecological values of the area.

#### Responses to Letter 40

- A. The tables and narrative have been corrected to state that no significant impact is expected. This is to allow for both positive benefits, accrued over time due to professional land management techniques and minor negative impacts, associated with construction of grazing facilities and surface disturbance from oil and gas activity.
- B. The 450 estimated visits for vehicle based hunting is considered to be a low use of this large tract of land.
- C. It should be noted that Bitter Creek qualified for study because the area, as a whole, appeared natural. From many localized points there are clearly manmade developments which appear as just that. The area already has 43 reservoirs, 59.4 miles of fence, 19.5 miles of vehicle ways and other developments. The new developments probably would not destroy the overall apparent naturalness of the area, but would increase the area where site specific impacts to naturalness are noticeable.
- D. The reasons are stated on page 53 of the final EIS.
- E. Local opinion has run 98-99% against wilderness designation. The EIS does reference some recent national and state surveys. It is impossible to conclude that a majority of Americans favor additional wilderness.
- F. The letters and oral comment received on the draft EIS are included in this final EIS.
- G. The EIS does not present any bias against prairie. The Bitter Creek WSA is just proposed for other than wilderness management. See Response A to Letter 30.

- H. The EIS includes an estimate of possible impacts from the proposed action. The BLM has no evidence to conclude that the WSA will be developed beyond the specific range of activities discussed in the EIS.
- I. The final EIS includes the BLM's consultation with the U.S. Fish and Wildlife Service on threatened and endangered species (T&E). The consultation concluded that there would be no significant impact on T&E species with the proposed action (see Appendix 3.3).

The gray wolf was not included as a possible threatened and endangered species by the U.S. Fish and Wildlife Service and reference to the gray wolf has been deleted from the text of the EIS.

#### Responses to Letter 43

- A. No lands have been identified for sale or exchange in Bitter Creek.
- B. None of the proposed developments, that would occur without wilderness designation, would significantly impact antelope winter range.

#### Responses to Letter 44

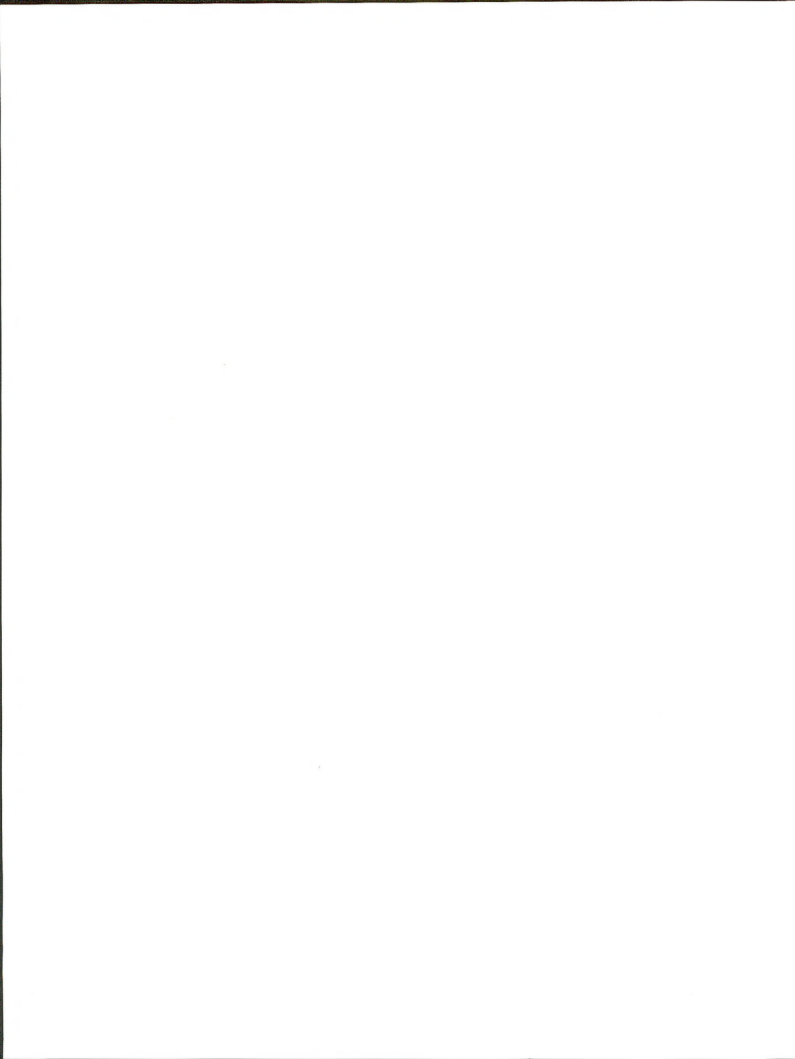
- A. Wells in this area are normally connected to an underground natural gas pipeline. There should be no significant impact to air quality as no natural gas is burned off. Any water produced will be pumped into trucks and transported to disposal areas outside the WSA.
- B. The Bitter Creek EIS addresses the impacts of wilderness designation on other resource uses and the impacts of resource development on wilderness values within the EIS if not designated. The economic and social impacts of full field development of natural gas within Bitter Creek on local communities is beyond the scope of this EIS. The area is accustomed to full field development because of its nearness to the Bowdoin natural gas field in Phillips County and the western portion of Valley County. The lifestyle of the area is associated with Bitter Creek as a non-wilderness area and we can only assume that the current lifestyle would continue with the No Wilderness Alternative.

#### Response to Letter 77

- A. Public lands are the common property of all Americans. The law is clear that all interested publics have an equal right to offer input into the management of public lands.

#### Responses to Letter 87

- A. The EIS states that wilderness could accrue some additional protection to wildlife. There is however, no evidence to suggest that continuation of existing management will create any serious threat to wildlife.
- B. The final EIS documents the fact that there is habitat for the black-footed ferret, but also concludes the proposed action will have no significant impact on the habitat.
- C. This acreage exceeds the total WSA acreage and is beyond the scope of the EIS alternatives.





## LIST OF PREPARERS

**Gary Pavек: Team Leader**

BA Economics, University of Montana; MA Outdoor Recreation, University of Maryland. Gary has been involved in environmental writing with the BLM for four years. He coordinated work assignments and provided day-to-day project direction. Gary wrote the document introduction, description of the Alternatives and portions of the Wilderness sections.

**Rich Adams: Range Conservationist**

Rich graduated from Colorado State University and has been with BLM four years. He wrote the range and vegetation portions of this EIS.

**Mike Fisher: Wildlife Management Biologist**

Mike graduated from California Technical State University and has been with BLM seven years. He wrote the wildlife portion of this EIS.

**Philip Gezon: Outdoor Recreation Planner**

BA History and Biology, Kenyon College; MS Outdoor Recreation Management, University of Oregon. Phil worked for the USFS and NPS before joining BLM six years ago. He was responsible for the Recreation and Wilderness portions of this EIS as well as the overall technical coordination.

**Ann Patterson Bishop: Visual Information Officer**

Attended Colorado State University for three years, majoring in Art Education. Ann has worked on a number of BLM projects over the past five years. She did the illustrating, cartography, drafting and layout work on this EIS.

**Jerry Majerus: State Office Economist**

BS in Forestry, University of Montana; MS in Forestry, University of Montana. Jerry worked on the Economics portions of this document and has worked two years with BLM.

**Joan Trent: State Office Sociologist**

BA in Psychology, Miami (Ohio) University. Joan wrote the Social conditions portion of this EIS and has worked five years for BLM.

**Glenn Hadden: Wildlife Management Biologist**

BS in Wildlife Science, Oregon State University. Glenn has worked with BLM for nine years. He worked on the land status portion of this document and helped prepare the base maps.

**Sandra Padilla: Supervisory Clerk**

AA in Business Administration. Sandra distributed and assigned the typing for this project. She has worked 12 years for BLM.

**Debbie Tucek: Word Processor Operator**

Debbie graduated from St. Leo's High School in Lewistown, Montana. She typed portions of the EIS and has been with BLM for two years.

Beulah Derr: Word Processor Operator

Beulah graduated from Washakie County High School in Worland, Wyoming. She typed portions of this EIS and has been with the BLM five years.

Kathy Ruckman: Word Processor Operator

Kathy graduated from Fergus County High School and has been with BLM one year.

Jan Snyder: Personnel Clerk

Jan attended the University of Montana and has been with BLM five years. She was responsible for compiling the mailing list and mailing this EIS.

Barbara Sereday: Mail and File Clerk

Barb graduated from Fergus County High in Lewistown and has worked at BLM for five years. She mailed this EIS.

Craig K. Flentie: Writer/Editor

BS Technical Journalism and Mass Communications. Kansas State University. Craig wrote portions of and edited this EIS. He has been with BLM four years.

These people from the BLM Montana State Office assisted in preparing this EIS:

Larry Pointer - State Office Review Team

Bob Lund - State Office Review Team

Rick Kirkness - Printing Specialist

Kathy Ives - Printing Technician

James Chapman - Offset Photographer

## APPENDIX 1.1: MAJOR MFP DECISIONS

The following are excerpts from the Valley Framework Plan.

### OBJECTIVES

To identify and protect lands in the planning area of potential wilderness value and of adequate size for inclusion into the National Wilderness System.

### RECOMMENDATIONS

#### Valley MFP

##### R-15.1

All areas within the planning unit of predominately public land which meet the basic criteria of: 1) 5,000 or more acres or of a manageable size to maintain essential wilderness characteristics; 2) roadless and; 3) of primitive character will be inventoried for wilderness characteristics and possible inclusion into the National Wilderness System by 1991. Lands in the planning unit presently identified as perhaps meeting the above criteria include:

Ppr-001 Burnt Lodge  
Ppr-002 Timber Creek  
Ppr-003 Gravel Hill  
Ppr-004 Carpenter Creek  
Ppr-005 Bomber  
Ppr-006 Dog Creek North  
Ppr-007 Grant Creek  
Ppr-008 Lone Tree  
Ppr-009 Sage Creek

##### P-15.2

All wilderness study areas will be managed so as to preserve their wilderness characteristics. All current activities can continue subject to controls in order to protect wilderness values. Under the Organic Act, this provides for the continuation of existing mining use, grazing use and mineral leasing in the same manner and degree as was being conducted on October 21, 1976.

### DECISIONS

Recreation  
Recommendation  
R-7.1 is accepted.

Accepted the  
Multiple-use  
Recommendations.

Source: BLM 1983



## APPENDIX 1.2: ISSUE LETTER

### United States Department of the Interior Bureau of Land Management

July 1983

Dear Citizen:

The Bureau of Land Management (BLM) is starting a study of the 59,660 acre Bitter Creek Wilderness Study Area (WSA) located in northeastern Montana. The study area is in the Valley Resource Area of the BLM's Lewistown District. The study team will consist of personnel from both the Lewistown District Office and the Valley Resource Area Office in Glasgow. The study will result in preliminary recommendations to the Secretary of the Interior on the suitability or nonsuitability of the Bitter Creek Area for wilderness designation.

The BLM's decision to study the Bitter Creek Area was subject to appeal. Five appeals were received. All of the appeals were heard by the Department of the Interior's Board of Land Appeals (IBLA). On May 18, 1983, the IBLA made a final decision affirming the Final Inventory Decision of the Montana State Director that the Bitter Creek Area should be studied for its wilderness suitability.

Now that the appeals have been decided, I'd like to ask you to help us begin by making sure that we know all the issues that should be part of our study. I've enclosed a summary of the issues that arose during our two-year inventory of wilderness characteristics as well as during the protest and appeal periods.

Besides identifying additional issues, you may wish to discuss possible alternatives that might be analyzed in the study. These would be in addition to the All Wilderness and No Wilderness alternatives which definitely will be analyzed.


To better enable us to discuss the study with you personally, we have scheduled BLM personnel to be available from 1:00 p.m. to 8:00 p.m. in the Valley Resource Area Office in Glasgow on August 10 and 11.

If you can't stop by the resource area office, please take time to write. It would be most helpful if we could hear from you by August 28, 1983.

If you wish to continue to receive information about the Bitter Creek Study, please return the enclosed post card by August 28.

Thank you for your help so far and I look forward to working with you throughout the study.

Sincerely yours,



Glenn W. Freeman  
District Manager

Enclosure





## **APPENDIX 2.1:**

### **ALTERNATIVES CONSIDERED BUT NOT RECOMMENDED FOR DETAILED ANALYSIS**

#### **Bitter Creek South Alternative**

As Bitter Creek South is one of the three roadless tracts making up the Bitter Creek WSA, it was considered as a possible alternative. With this alternative 8,605 acres would be recommended as suitable for wilderness while 51,055 acres would be recommended as nonsuitable and would continue in multiple use management. During the planning process a number of factors were considered in determining a range of reasonable alternatives. Bitter Creek South was not considered a viable alternative for detailed analysis because:

1. Outstanding solitude is restricted to a very few isolated pockets because of the segments size, limited screening and location of boundary roads.
2. There is a potential manageability problem with access on a state owned inholding and from a lack of identifiable boundaries between public and private land on the western edge of the segment.
3. The area contains a small infestation of leafy spurge which has the potential to spread.
4. This segment has a high percentage of pre-FLPMA oil and gas leases, is the closest segment to the known gas field and is easily accessible for exploration and/or development.
5. The area has the highest preponderance of proposed range projects in the Bitter Creek WSA including 450 acres for chiseling, 4 pit reservoirs and 2.5 miles of fence.

#### **Bitter Creek West Alternative**

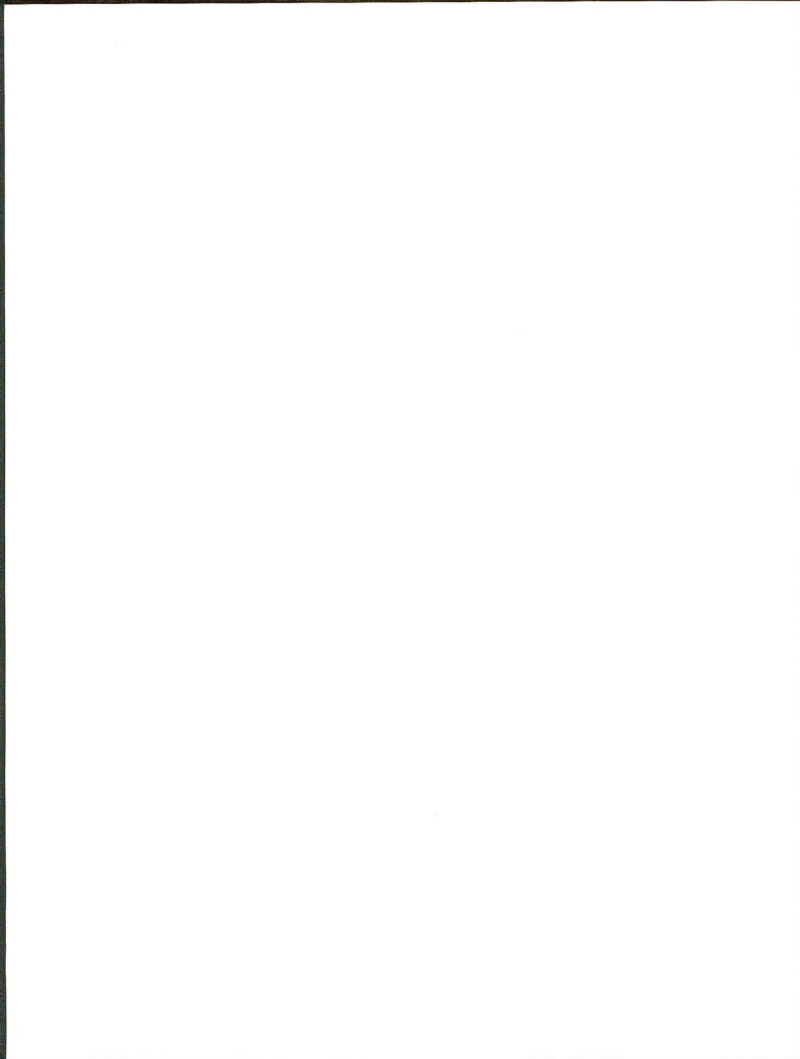
Bitter Creek West is one of the three roadless tracts making up the Bitter Creek WSA and was considered as an alternative. This alternative would recommend 11,105 acres as suitable for wilderness designation and 48,555 acres as nonsuitable. During the planning process it was determined that this alternative did not meet the criteria for detailed study because of questions of wilderness manageability, wilderness quality, and resource conflicts. The alternative was not considered viable for detailed study because:

1. Areas with outstanding solitude area limited due to the flat topography lack of screening vegetation and location of boundary roads. The area has the fewest wilderness attributes of the three segments.
2. There are 11 reservoirs scattered throughout the unit which would increase conflicts with solitude and naturalness when maintenance and/or reconstruction is necessary.
3. The 800 acres proposed for chiseling would be foregone.

4. The boundary is not manageable even with extensive use of signs, patrols etc., because it is on legal subdivisions rather than identifiable physiographic features.
5. Other than hunting, the area contains little or no outdoor recreational values. Hunting is almost all vehicle based.

## APPENDIX 3.1: COMMON PLANT SPECIES IN THE WSA

| <u>Common Name</u>           | <u>Scientific Name</u>           |
|------------------------------|----------------------------------|
| <b>Grasses and Grasslike</b> |                                  |
| Western wheatgrass           | <i>Agropyron smithii</i>         |
| Little bluestem              | <i>Andropogon scoparius</i>      |
| Blue grama                   | <i>Bouteloua gracilis</i>        |
| Plains reedgrass             | <i>Calamagrostis montanensis</i> |
| Prairie sandreed             | <i>Calamovilfa longifolia</i>    |
| Carex                        | <i>Carex spp.</i>                |
| Plains mulhy                 | <i>Muhlenbergia cuspidata</i>    |
| Sandberg bluegrass           | <i>Poa secunda</i>               |
| Needleandthread              | <i>Stipa comata</i>              |
| Green needlegrass            | <i>Stipa viridula</i>            |
| <b>Half Shrubs/Forbs</b>     |                                  |
| Fringed sagewort             | <i>Artemisia frigida</i>         |
| Milkvetch                    | <i>Astragalus spp.</i>           |
| Leafy spurge                 | <i>Euphorbia esula</i>           |
| Dotted gayfeather            | <i>Liatris punctata</i>          |
| Silverleaf scurfpea          | <i>Psoralea argophylla</i>       |
| Prairie thermopsis           | <i>Thermopsis rhombifolia</i>    |
| American vetch               | <i>Vicia americana</i>           |
| Cocklebur                    | <i>Xanthium spp.</i>             |
| <b>Shrubs and Trees</b>      |                                  |
| Silver sagebrush             | <i>Artemisia cana</i>            |
| Nuttall saltbrush            | <i>Atriplex nuttallii</i>        |
| Rubber rabbitbrush           | <i>Chrysothamnus nauseosus</i>   |
| Creeping juniper             | <i>Juniperus horizontalis</i>    |
| Plains cottonwood            | <i>Populus sargentii</i>         |
| Quaking aspen                | <i>Populus tremuloides</i>       |
| Chokecherry                  | <i>Prunus virginiana</i>         |
| Rose                         | <i>Rosa spp.</i>                 |
| Greasewood                   | <i>Sarcobatus vermiculatus</i>   |
| Silver buffaloberry          | <i>Shepherdia argentea</i>       |

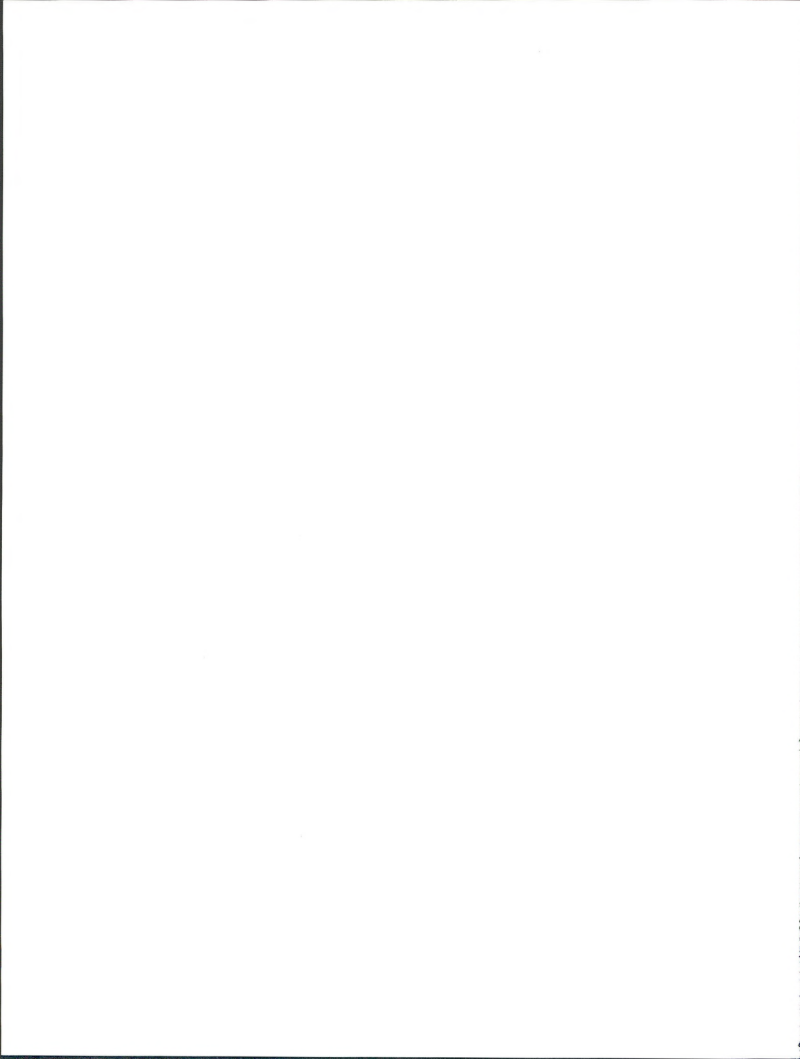


## APPENDIX 3.2:

### COMMON ANIMAL SPECIES IN THE WSA

| <u>Common Name</u>                      | <u>Scientific Name</u>           |
|---|----------------------------------|
| <b>Big Game</b>                         |                                  |
| Mule deer                               | <i>Odocoileus hemionus</i>       |
| White-tailed deer                       | <i>Odocoileus virginianus</i>    |
| Pronghorn antelope                      | <i>Antilocapra americana</i>     |
| <b>Upland Game Birds</b>                |                                  |
| Sage grouse                             | <i>Centrocercus urophasianus</i> |
| Sharp-tailed grouse                     | <i>Pediocetes phasianellus</i>   |
| Hungarian (gray) partridge              | <i>Perdix perdix</i>             |
| <b>Waterfowl</b>                        |                                  |
| Canada geese                            | <i>Branta canadensis</i>         |
| Mallard                                 | <i>Anas platyrhynchos</i>        |
| Pintail                                 | <i>Anas acuta</i>                |
| Gadwall                                 | <i>Anas strepera</i>             |
| Blue-winged teal                        | <i>Anas discors</i>              |
| <b>Fur-Bearing Mammals</b>              |                                  |
| Coyote                                  | <i>Canis latrans</i>             |
| Muskrat                                 | <i>Ondatra zibethica</i>         |
| Beaver                                  | <i>Castor canadensis</i>         |
| Badger                                  | <i>Taxidea taxus</i>             |
| Skunk                                   | <i>Mephitis mephitis</i>         |
| Mink                                    | <i>Mustela vison</i>             |
| Weasel                                  | <i>Mustela spp.</i>              |
| Fox                                     | <i>Vulpes fulva</i>              |
| <b>Predators</b>                        |                                  |
| Coyote                                  | <i>Canis latrans</i>             |
| <b>Fish</b>                             |                                  |
| Rainbow trout                           | <i>Salmo gairdneri</i>           |
| Largemouth bass                         | <i>Micropterus salmoides</i>     |
| <b>Threatened or Endangered Species</b> |                                  |
| Peregrine falcon                        | <i>Falco peregrinus</i>          |
| Bald eagle                              | <i>Haliaeetus leucocephalus</i>  |
| Black-footed-ferret                     | <i>Mustela nigripes</i>          |

Source: BLM, 1981





APPENDIX 3.3:  
THREATENED AND ENDANGERED  
SPECIES CORRESPONDENCE

8500

APR 26 1984

Mr. Ron Crete  
U.S. Fish & Wildlife Service  
Federal Building, U.S. Courthouse  
P.O. Box 10023  
Helena, MT 59626

Dear Mr. Crete:

Our office is preparing an environmental impact statement on the effects of wilderness designation of the 59,660 acre Bitter Creek Wilderness study area located in Valley County. The enclosed map details the study area's boundaries. Please provide us with a list of threatened or endangered species which may occur in this area. Thank you for your input.

Sincerely yours,

/s/ Glenn W. Freeman  
Glenn W. Freeman  
District Manager

Enclosure

GPAVEK:pcj:04/26/84:MAG

UNITED STATES GOVERNMENT

# Memorandum

M.02.84.026

TO : District Manager, Bureau of Land Management  
Lewistown District Office, Lewistown, MT

DATE: May 1, 1984

FROM : Field Supervisor, Endangered Species, Helena, MT (SE)

SUBJECT: Section 7 Species List for the Bitter Creek Wilderness Study Area,  
Valley County, Montana

This responds to your April 26, 1984 letter regarding the proposed  
Bitter Creek Wilderness Study Area, located in Valley County, Montana.

In accordance with Section 7(c) of the Endangered Species Act as amended,  
we have determined that the following listed and proposed threatened and  
endangered species may be present in the project area.

## Listed Species

Bald eagle (Haliaeetus leucocephalus)

Peregrine falcon (Falco peregrinus)

Black-footed ferret (Mustela nigripes)

## Expected Occurrence

Migrant

Migrant

Possible resident  
prairie dog towns

## Proposed Species

none

|          |       |               |       |
|----------|-------|---------------|-------|
| DM       | _____ | L & RR        | _____ |
| ASSOC-DM | _____ | PA            | _____ |
| ADMIN.   | _____ | EVR           | _____ |
| P/EA     | _____ | MIN           | _____ |
| OPR      | _____ | JUD           | _____ |
| USDI     |       | MAY 02 1984   |       |
| RECEIVED |       | LEWISTOWN, MT |       |
| ACTION   |       | _____         |       |



5010-110

Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

Section 7(c) of the Act requires that you conduct and submit to the FWS a biological assessment to determine the effects of the proposed project on listed and proposed species. If not initiated within 90 days, the list should be verified with the FWS prior to initiation of the assessment. The biological assessment should be completed within 180 days of initiation, but can be extended by mutual agreement between your agency and the FWS. The assessment conducted pursuant to Section 7(c) may be undertaken as part of your agency's compliance with the requirements of Section 102 of NEPA and incorporated into the draft EIS.

Upon completion of your assessment, if you determine that the project will affect any of the above listed species, formal consultation with the FWS through my office should be initiated. If you determine that any proposed species may be affected, an informal conference with my Endangered Species Team should be initiated to discuss measures that can be taken for their conservation. Section 7(d) of the Act requires that during the consultation process, the Federal agency and the permit or license applicant shall not make any irreversible or irretrievable commitment of resources which would preclude the formulation of reasonable and prudent alternatives.

Please contact us if we can be of further assistance.

*Wayne L Brewster*

cc: Regional Director, FWS, Region 6, Denver, CO (FA/SE)  
Ecological Services, FWS, Billings, MT



# United States Department of the Interior

1792

BUREAU OF LAND MANAGEMENT  
LEWISTOWN DISTRICT OFFICE  
Airport Road  
Lewistown, Montana 59457-1300

Mr. Ron Crete  
U.S. Fish and Wildlife Service  
Federal Building, U.S. Courthouse  
P.O. Box 10023  
Helena, MT 59626

Dear Mr. Crete:

Enclosed is the biological assessment for the Bitter Creek Wilderness Study area in Valley County.

Please contact either Bill Bishop of my staff (538-7461) or Mike Fisher in Glasgow (228-4316), if you have any questions.

Sincerely yours,

Glenn W. Freeman  
District Manager

Enclosure

THREATENED AND ENDANGERED SPECIES  
BIOLOGICAL ASSESSMENT  
FOR  
THE BITTER CREEK WILDERNESS STUDY AREA  
DRAFT ENVIRONMENTAL IMPACT STATEMENT

USDI, BUREAU OF LAND MANAGEMENT  
LEWISTOWN DISTRICT  
VALLEY RESOURCE AREA HEADQUARTERS

JUNE 1984

## INTRODUCTION

The draft environmental impact statement (EIS) for the Bitter Creek Wilderness Study Area (WSA) analyzes its suitability as a part of the National Wilderness Preservation System. Pursuant to Section 603 of the Federal Land Policy and Management Act (1976), 59,660 acres of public lands in Valley County, Montana, were reviewed for wilderness characteristics and evaluated as to the affect of wilderness designation or nondesignation on the environment and land uses. This is capsulized in the draft EIS on page i, Summary.

The principal uses identified by the EIS are cattle grazing and big game hunting. The issues raised by the public and analyzed in the document are listed on page three of the draft EIS.

The EIS evaluates four alternatives for management of the WSA. The alternatives ranged from all wilderness to no wilderness with two intermediate options. The no wilderness alternative was the preferred alternative analyzed in the study. Detailed descriptions of the alternatives can be found in the EIS.

## PURPOSE AND NEED

Under Section 7 of the Endangered Species Act (ESA) (1973), a biological assessment is required for all EISs. The assessment outlines the potential of the alternatives to affect the listed endangered species. A may affect/no affect designation will be determined for each of the species within each alternative.

## AFFECTED SPECIES

The U.S. Fish and Wildlife Service (FWS) (1984) provided a list of threatened and endangered species that may be present in the WSA:

### Listed Species

Bald eagle, *Haliaeetus leucocephalus*  
Peregrine falcon, *Falco peregrinus*  
Black-footed ferret, *Mustela nigripes*

### Expected Occurrence

Migrant  
Migrant  
Possible resident in prairie dog towns

All three species are in endangered status, and this assessment addresses only those three.

### Bald Eagle

FWS expects the bald eagle to occur as a migrant in the WSA and this is supported by BLM biologists observations (1977-1984). All BLM sightings, both within and near the unit boundaries, have occurred either in the spring or fall, as would be expected for a migrant species. Flath (1983) lists the bald eagle as breeding in the Latilong (No. 10) which includes the Bitter Creek Watershed. The only significant amount of breeding habitat, riverine forest (green ash/cottonwood) as described by Kroodsma (1973), in Latilong 10 is the Milk River and Fort Peck dredge cuts area on the Missouri River, approximately 25 miles south and 50 miles southwest, respectively, of the WSA. The breeding report originated in the Milk River-Missouri River confluence areas in 1968 (Flath, personal communication). Skaar (1980), who originally listed the Latilong 10 breeding report, described the report as "old." There is no known or potential nesting habitat within the WSA due to a lack of trees; the only trees in the unit consist of a few scattered cottonwoods (*Populus deltoides*), an occasional willow (*Salix spp.*) and some quaking aspen (*Populus tremuloides*) stands. The 1984 nesting survey flight by BLM revealed no bald eagles in Bitter Creek and no nesting pairs in Valley County. Areas of eagle sightings have been within heavily hunted crucial mule deer winter range and the birds may be attracted by the carrion offered in large deer concentrations; i.e., winterkills, wounding losses, ofal, etc. However, only a few deer carcasses have been observed in the area.

### Peregrine Falcon

The FWS (1984) designates this species as a migrant through the Bitter Creek area and Flath (1981) shows the peregrine as transient for Latilong 10 with no nesting records. While none have been noted inside the unit, Valley RAH biologists have observed one peregrine within 12 miles of the WSA boundary and another less than 3 miles. There is no known existing or potential peregrine nesting habitat within the unit, and the birds probably use Bitter Creek only during migration. The prey base is not attractive since the unit has very limited waterfowl/shorebird habitat and the passerine populations are similar to surrounding areas; i.e., food abundance is the same or less than nearby habitats.

### Black-Footed Ferret

Ferret occurrence within the study area is considered possible by FWS (1984), a view supported by Flath's (1981) suspected designation of ferret existence in Valley County. No ferret sightings are on record for the WSA and the only potential habitat within it is a prairie dog town in Sections 22 and 23, T. 33 N., R. 37 E., which is outside of the nearest interagency Black-footed ferret priority area, (BLM 1984). See Appendix 1. It is the only known colony in the Bitter Creek unit and encompassed 196 acres when last surveyed by BLM in 1982; 135 acres or 69 percent are private land. The dog town is isolated from other towns, the next closest being approximately 14 miles northwest; there are only three confirmed towns in north Valley County (outside of the Fort Peck Indian Reservation), an area of well over one million acres. The isolation of this town and the low density of prairie dogs north of the Milk River reduces the probability of ferrets inhabiting this particular site. Pedestrian surveys of the entire colony in 1979 and 1982 revealed no evidence of ferrets (sightings, trenches, tracks, scats, skulls, etc.).

### MAY AFFECT/NO AFFECT SITUATIONS

The four alternatives were examined for any impact to the three listed species. Positive and negative potential affects were considered for both the given individual animal and for its total populations. Significance of the affect was a factor; i.e., if the affect would not result in a significant impact to the species, a "no affect" designation was made. A "may affect" designation required a definite and significant affect to either an individual animal, its population or habitat.

### MANAGEMENT GUIDANCE COMMON TO ALL ALTERNATIVES

Regardless of the alternative selected, any subsequent project or activity will be individually evaluated for impacts to threatened and endangered species and their habitats, as required by the ESA (1973).

### NO WILDERNESS ALTERNATIVE (PROPOSED ACTION)

#### Bald Eagle

This alternative amounts to continuing management as existed prior to WSA designation; that is the management which produced the existing habitat conditions. Low numbers of bald eagles could be expected to continue to occasionally use the Bitter Creek area during spring and fall migrations. Without the protection of wilderness status, the unit would be open to land uses, such as mining or energy development, which might reduce eagle usage through increased disturbance levels or habitat alteration. Presently, there are no known plans for such development. Due to continued unrestricted hunter access, deer population increases would be less or slower than with the wilderness alternatives and, therefore, available carrion would remain essentially the same as the existing situation.

The significance of these impacts would be slight because the area is probably of low value to bald eagles; i.e., few birds currently use the WSA. In addition, any individual activity proposed for public lands must receive at least an environmental assessment which includes compliance with ESA and any surface disturbing activities are subject to a host of protective stipulations. As an example of the type of stipulations used, the following applies to oil and gas leases:

**ENDANGERED OR THREATENED SPECIES** - The federal surface management agency is responsible for assuring that the leased land is examined prior to undertaking any surface disturbing activities to determine affects upon any plant or animal species, listed or proposed for leasing as endangered or threatened, or their habitats. The findings of this examination may result in some restrictions to the operator's plans or even disallow use and occupancy that would be in violation of the Endangered Species Act of 1973 by detrimentally affecting endangered or threatened species or their habitats.

The lessee/operator may, unless notified by the authorized officer of the surface management agency that the examination is not necessary, conduct the examination on the leased lands at his discretion and cost. This examination must be done by or under the supervision of a qualified resources specialist approved by the surface management agency. An acceptable report must be provided to the surface management agency identifying the anticipated affects of a proposed action on endangered or threatened.

Variations in deer carrion is a questionable impact since it is unclear if offal or winterkills are actually attracting bald eagles or if the birds are using Bitter Creek for some other reason. Considering that it is low value eagle habitat, the tentative and indirect nature of possible impacts, and the normal review process, which considers impacts to threatened and endangered species, continuation of normal management in Bitter Creek would likely not change the existing situation for bald eagles. No affect is found for this species under this alternative.



### Peregrine Falcon

The birds would continue to occasionally migrate through the unit. None have been observed within the WSA and it is considered low value habitat. As with bald eagles, chances for disturbing activities in the area are greatest in this alternative, but since very few, if any, birds would be impacted and all surface disturbing activities are reviewed for ESA compliance, there is no affect for peregrine falcons.

### Black-Footed Ferrets

Again, this alternative allows the most opportunity for other disturbing land uses and prairie dog control would be easiest to authorize under it. Chances are presently low for any of these actions; poisoning may occur on the private portion but is not likely to be permitted on the BLM-administered part of the dog town due to the lack of a prairie dog resource in north Valley County. Standard operating procedure dictates that any prairie dog control proposal on public land must have, at least, an EAR which includes ESA compliance and requires an intensive survey for threatened and endangered species, including black-footed ferrets (BLM 1983). These considerations, plus a dearth of evidence that any ferrets inhabit the colony, indicate a no affect for this species.

## ALL WILDERNESS ALTERNATIVE

### Bald Eagle

This is the most favorable alternative for the eagles. Disturbing activities would not be authorized other than those caused by man afoot or on horseback. Deer numbers would increase and probably eventually exceed, or further exceed, carrying capacity on the winter range. If deer carrion is a factor in eagle occurrence in Bitter Creek, this population increase would provide more food, at least in the short term. Eventually, the deer would decline in numbers after carrying capacity is surpassed and carrion amounts would then also go down.

This scenario would probably attract only a few more eagles and the impact would not be important for either individuals or the species as a whole. There would be no affect for the species with this alternative.

### Peregrine Falcon

Peregrine use would not change appreciably. Lower disturbance levels would improve the habitat within the WSA but not enough to overcome the lack of potential eyries and prey base. This alternative would have no affect.

### Black-Footed Ferret

The prairie dog colony would be more secure from mining, energy development, mechanical range improvement treatments and somewhat more secure from poisoning, although wilderness status may not prevent use of toxicants. Control could still take place on the private portion of the town, unless land trades/acquisitions were made to gain those private holdings. No affect is the designation since no development is currently planned, no prairie dog poisoning on public lands is planned and no ferret occurrence is suspected.

## BITTER CREEK EAST ALTERNATIVE

### Bald Eagle/Peregrine Falcon

The impacts would be the same for these species as in the All Wilderness Alternative but would apply to a smaller area (39,950 acres versus 59,660).

### Black-Footed Ferret

Since the prairie dog town is not within the boundaries of this alternative, the affect on the black-footed ferret is the same as for the No Wilderness option.

## ENHANCED WILDERNESS MANAGEABILITY ALTERNATIVE

### Bald Eagle/Peregrine Falcon/Black-Footed Ferret

The situation is identical to the Bitter Creek East Alternative except that the acreage is less (26,000 acres versus 59,660 acres).

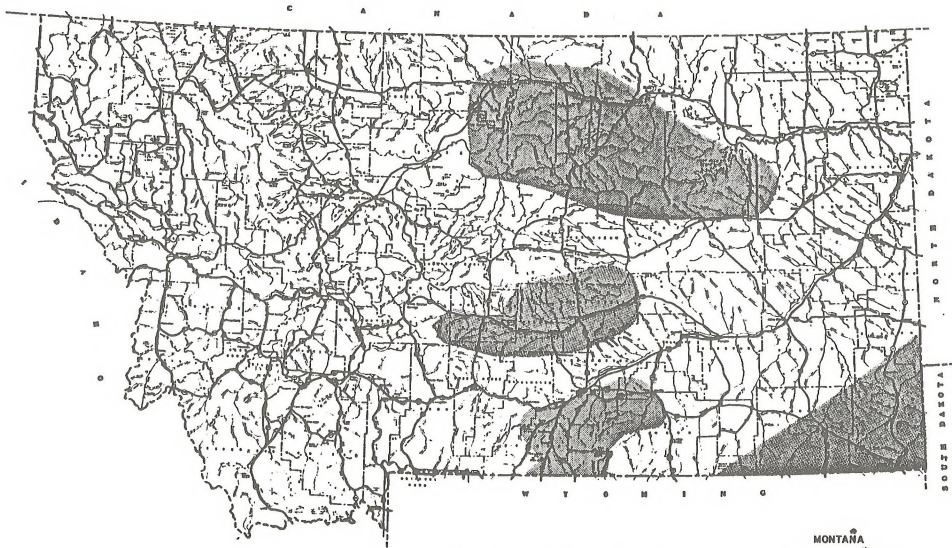
## SUMMARY

No affect was found for all three species on all four alternatives.

## BIBLIOGRAPHY

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- Flath, Dennis L. 1981. "Vertebrate Species of Special Concern." Wildlife Division, Montana Department of Fish, Wildlife and Parks, Bozeman, Montana.
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- \_\_\_\_\_. 1983. "State Director Guidance for Resource Management Planning in Montana and the Dakotas." Montana State Office, Billings, Montana.
- United States Department of the Interior, Fish and Wildlife Service. 1984. "Section 7 Species List for the Bitter Creek Wilderness Study Area, Valley County, Montana." Memo M.02.84.026. Helena, Montana.

# INTERAGENCY BLACK-FOOTED FERRET PRIORITY AREAS



- Approximate location of Bitter Creek prairie dog town



1993 Revised. 1:500,000 scale.  
Data from various sources.  
For more info contact the BFF.

UNITED STATES GOVERNMENT

# Memorandum

TO : District Manager, Bureau of Land Management  
Lewistown District Office, Lewistown, MT

DATE: July 9, 1984

FROM : Acting Field Supervisor, Endangered Species, Helena, MT (SE)

SUBJECT: Concurrence of No Affect on the Bitter Creek Wilderness Study Area Draft  
Environmental Impact Statement

We have reviewed the biological assessment and your "no affect" determination for the subject project. We concur with your "no affect" determination as a result of implementation of any of the four alternatives described in the EIS on the endangered bald eagle, peregrine falcon, or black-footed ferret.

We appreciate the efforts of your staff in completing this thorough and well organized biological assessment. Thank you for your efforts in meeting our joint responsibilities under the Endangered Species Act. Please contact us again if we can be of further assistance on this and future projects.

*Dan Hinkley*

cc: Ecological Services, Billings, MT  
BLM State Office, Billings, MT ATTN: Dan Hinkley, Ray Holm

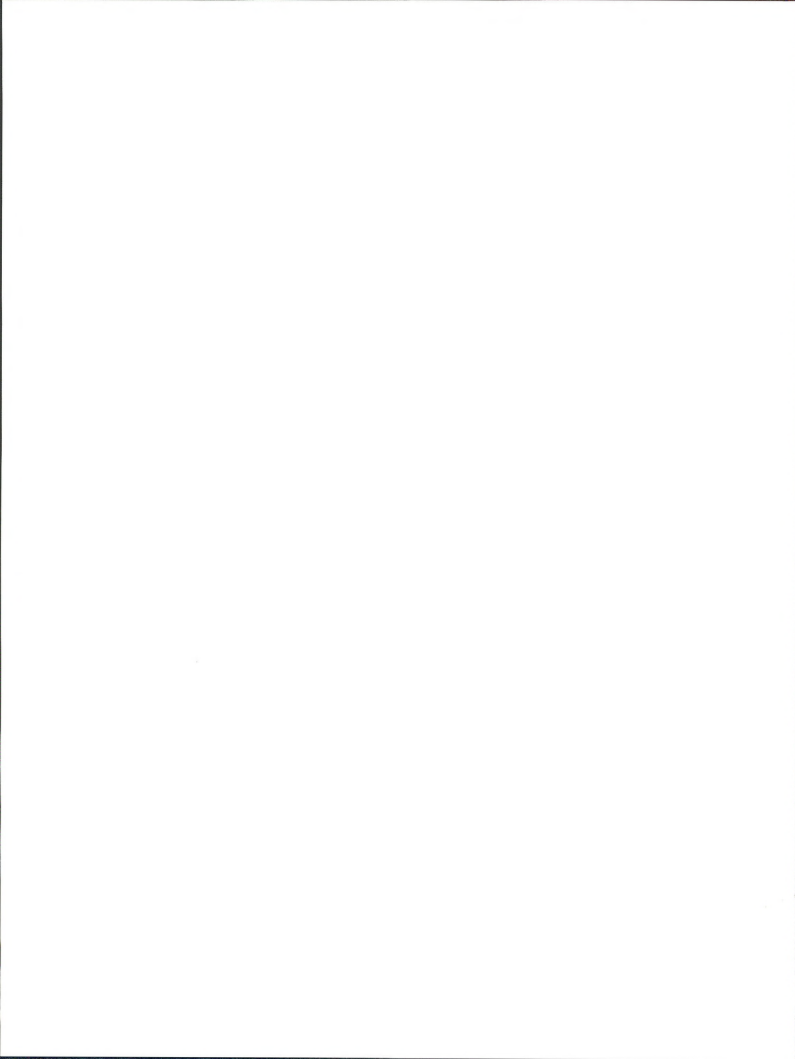
|               |       |
|---------------|-------|
| DM            | L & R |
| ASSOC. DM     | PA    |
| ADMIN.        | ENV   |
| P/EA          | MIN   |
| OPR           | SUP   |
| JUL 11 1984   |       |
| RECEIVED      |       |
| LEWISTOWN, MT |       |
| ACTION        |       |





# APPENDIX 3.4: GEOLOGIC FORMATIONS, BITTER CREEK WSA

| SYSTEM        | SERIES | SYMBOL          | FORMATION       | GENERAL LITHOLOGIC DESCRIPTION   |
|---------------|--------|-----------------|-----------------|--|
| QUATERNARY    |        | Qa              | Alluvium        |  |
| TERTIARY      |        | Tfg             | Flaxville       | Alluvial and glacial clay, sand, and gravel                                |
| CRETACEOUS    | UPPER  | Kfh             | Fox Hills       | Sandstone; conglomerate  |
|               |        | Kb              | Bearpaw Shale   | Shale; shale and sandstone; conglomerate                                   |
|               |        | Kjr             | Judith River    | Shale; shale and sandstone; sandstone interbedded with shale; conglomerate |
|               |        | Kcl             | Clegggett       | Shale; shale and sandstone; conglomerate                                   |
|               |        | Ka              | Eagle           | Shale; sandstone; conglomerate   |
|               |        | Kul             | Telegraph Creek | Shale  |
|               |        |                 | Wicbrara        | Shale; shale interbedded with limestone                                    |
|               |        |                 | Carlisle        | Shale; sandstone and shale   |
|               |        |                 | Greenhorn       | Shale; limestone   |
|               |        |                 | Belle Fourche   | Shale; sandstone   |
|               | LOWER  | Kl              | Mowry           | Shale  |
|               |        |                 | Thermopolis     | Shale  |
|               |        | KJ              | Dakota          | Sandstone; sandstone and shale   |
|               |        |                 | Fuson           | Sandstone interbedded with shale; shale                                    |
|               |        |                 | Lakota          | Sandstone; sandstone interbedded with shale                                |
|               |        |                 | Morrison        | Shale and sandstone  |
| JURASSIC      | UPPER  |                 | Swift           | Sandstone; sandstone and shale; sandstone interbedded with limestone       |
|               | LOWER  |                 | Sundance        | Shale; sandstone; limestone  |
| TRIAS-SIC     |        |                 | Piper           | Shale; sandstone; shale and sandstone                                      |
|               |        | R               | Chugwater       | Limestone; shale and sandstone; anhydrite                                  |
| PERMIAN       |        |                 | Dinwoody        | Shale; sandstone; anhydrite  |
|               |        |                 | Phosphoria      | Chert; limestone; shale and sandstone; sandstone and anhydrite             |
| PENNSYLVANIAN |        |                 | Tensleep        | Sandstone  |
|               |        |                 | Amsden          | Limestone and sandstone  |
| MISSISSIPPIAN |        | PM              | Tylar           | Sandstone; sandstone and shale; anhydritic sandstone                       |
|               |        |                 | Beth            | Shale  |
|               |        |                 | Otter           | Anhydritic shale   |
|               |        |                 | Kibbey          | Sandstone  |
|               |        |                 | Charles         | Anhydritic limestone   |
|               |        |                 | Mission Canyon  | Limestone  |
|               |        |                 | Lodgopola       | Limestone  |
| DEVONIAN      |        | DC              | Bakkan          | Sandstone; sandstone and shale   |
|               |        |                 | Three Forks     | Dolomite; limestone; sandstone   |
|               |        |                 | Bird Bear       | Limestone  |
|               |        |                 | Duperow         | Limestone; anhydrite   |
|               |        |                 | Souris River    | Dolomite; sandstone; anhydrite   |
| SILURIAN      |        |                 | Interlake       | Dolomite   |
| ORDOVICIAN    |        |                 | Bighorn         | Dolomite interbedded with shale  |
| CAMBRIAN      |        |                 | Emerson         | Limestone; shale; sandstone  |
| PRECAMBRIAN   |        | Pc <sub>3</sub> |                 | Quartzite and metamorphic  |
|               |        | Pc <sub>1</sub> |                 | Metamorphic and granite  |





## APPENDIX 3.5:

### ALPHA-NUMERIC RATING SYSTEM

#### Numerical Classification Scheme

1. The geologic environment and the inferred geologic processes do not indicate favorability for accumulation of mineral resources.
2. The geologic environment and the inferred geologic processes indicate low favorability for accumulation of minerals resources.
3. The geologic environment, the inferred geologic processes, and the reported mineral occurrences indicate moderate favorability for accumulation of mineral resources.
4. The geologic environment, the inferred geologic processes, the reported mineral occurrences, the known mines or deposits indicate high favorability for accumulation of mineral resources.

#### Letter Classification Scheme (Level of Confidence)

- A. The available data are either insufficient and/or cannot be considered as direct evidence to support or refute the possible existence of mineral resources within the respective area.
- B. The available data provide indirect evidence, to support or refute the possible existence of mineral resources.
- C. The available data provide direct evidence, but are quantitatively minimal to support or refute the possible existence of mineral resources.
- D. The available data provide abundant direct and indirect evidence to support or refute the possible existence of mineral resources.



## APPENDIX 3.6: STATE ECOSYSTEM/LANDFORM REPRESENTATION EXISTING IN STATUTORY WILDERNESS

| A. Ecosystem/Landform<br>No. Name | Existing Representations in Statutory Wilderness                              |                                  |                     |                           |                          |             |                     |             |             |             |
|-----------------------------------|---|----------------------------------|---------------------|---------------------------|--------------------------|-------------|---------------------|-------------|-------------|-------------|
|                                   | BLM Areas   |                                  | Other Agency Areas* |                           | BLM Areas - Other States |             | Other Agency Areas* |             |             |             |
|                                   | No. Acres   | Acreage                          | Agency              | No. Acreage               | State                    | No. Acreage | State               | No. Acreage | No. Acreage | No. Acreage |
| Bailey/<br>Kuchler No. 57         | Grass/Needlegrass/<br>Wheatgrass  | N/A                              | N/A                 | USFWS 1 20,847            | N/A                      | N/A         | N/A                 | N/A         | N/A         | N/A         |
| B. Ecosystem/Landform<br>No. Name | Representations in Wilderness Endorsed by President - Pending Before Congress |                                  |                     |                           |                          |             |                     |             |             |             |
|                                   | BLM Areas   |                                  | Other Agency Areas* |                           | BLM Areas - Other States |             | Other Agency Areas* |             |             |             |
|                                   | No. Acres   | Acreage                          | Agency              | No. Acreage               | State                    | No. Acreage | State               | No. Acreage | No. Acreage | No. Acreage |
| Bailey/<br>Kuchler No. 57         | Grass/Needlegrass/<br>Wheatgrass  | N/A                              | N/A                 | USFWS 15 161,480          | N/A                      | N/A         | N/A                 | N/A         | N/A         | N/A         |
| C. Ecosystem/Landform<br>No. Name | Potential Sources of Representations  |                                  |                     |                           |                          |             |                     |             |             |             |
|                                   | BLM USAs  |                                  |                     |                           | Other Agency USAs*       |             |                     |             |             |             |
|                                   | District  | No.                              | Acreage             | Agency                    | Region, Park, Refuge     | No.         | Acreage             | No.         | Acreage     | No. Acreage |
| Bailey/<br>Kuchler<br>No. 57      | Grass/<br>Needlegrass/<br>Wheatgrass  | Lewistown<br>Miles City<br>Butte | 5<br>4<br>1         | 75,680<br>77,765<br>5,926 | N/A                      | N/A         | N/A                 | N/A         | N/A         | N/A         |

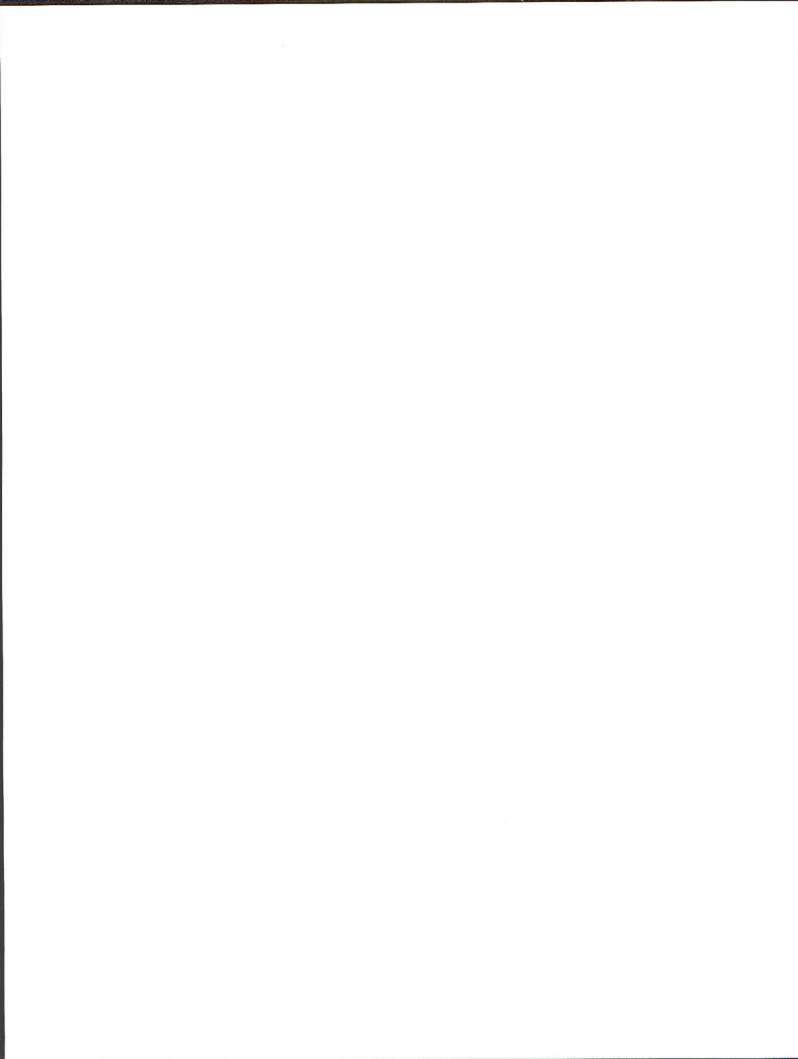
\*Includes areas administered by the State as Wilderness.

### NATIONAL ECOSYSTEM/LANDFORM REPRESENTATION

| A. Ecosystem/Landform<br>No. Name |                                  | Existing Representations in Statutory Wilderness                              |            |                 |         |         |        |     |         |
|-----------------------------------|----------------------------------|---|------------|-----------------|---------|---------|--------|-----|---------|
|                                   |                                  | State   | District   | No.             | Acreage | State   | Agency | No. | Acreage |
| Bailey/<br>Kuchler No. 57         | Grass/Needlegrass/<br>Wheatgrass | N/A   | N/A        | N/A             | N/A     | Montana | USFWS  | 1   | 20,847  |
| B. Ecosystem/Landform<br>No. Name |                                  | Representations in Wilderness Endorsed by President - Pending Before Congress |            |                 |         |         |        |     |         |
|                                   |                                  | State   | District   | No.             | Acreage | State   | Agency | No. | Acreage |
| Bailey/<br>Kuchler No. 57         | Grass/Needlegrass/<br>Wheatgrass | N/A   | N/A        | N/A             | N/A     | Montana | USFWS  | 15  | 161,480 |
| C. Ecosystem/Landform<br>No. Name |                                  | Location of BLM USAs with Potential Representations                           |            |                 |         |         |        |     |         |
|                                   |                                  | State   | District   | Number of Areas |         | Acreage |        |     |         |
| Bailey/<br>Kuchler No. 57         | Grass/Needlegrass/<br>Wheatgrass | Montana   | Lewistown  | 5               | 75,680  |         |        |     |         |
|                                   |                                  |   | Miles City | 4               | 77,765  |         |        |     |         |
|                                   |                                  |   | Butte      | 1               | 5,926   |         |        |     |         |

\*Includes areas administered by the State as Wilderness.

Source: BLM, 1981



## APPENDIX 4.1: METHODOLOGY USED TO ASSESS RANCH RELATED ECONOMIC IMPACTS

The ranch related economic impacts include the major impacts identified through scoping and public input and those identified by Leroy Luft, Agricultural Management and Economic Consulting (AMEC) (1982). Luft assessed the impacts of wilderness designation on ranch management costs and ranch loan and sale values. These impacts include increased costs due to limitations on vehicle way use and potential problems arising from restrictions on water development construction.

Some motor vehicle use on vehicle ways would be allowed under wilderness designation. For instance, the use of vehicles for hauling in bulls, hauling out sick animals, etc. would continue. However, most of these activities can occur outside the Wilderness Study Area (WSA) but within the allotments.

The following analysis will assess the additional cost incurred because casual vehicle use to check cows, water, fences, etc. would not be allowed. The methodology used is based on AMEC's (1982) study.

The additional cost to check cows and repair fences is based on the number of miles of fence and vehicle ways, the number of operators and the substitution of horses for casual vehicle use within the WSA. Annual vehicle costs are estimated to be about \$2 per mile of fence repaired while to cover a comparable area on horseback costs \$12 per mile. Agricultural Management and Economic Consulting (1982) estimates it would take two to three times as long to cover an area on horseback as it would by vehicle and vehicle ways would be used two times per month for six months to check cows. Table 1 lists the miles of fence and vehicle ways within the WSA by alternative and the additional maintenance expense and hours of labor annually.

Table 1  
Miles of fence and vehicle ways  
and additional expense and hours of labor  
annually by alternative

| <u>Alternative</u>                 | <u>Fence</u> | <u>Miles of<br/>Vehicle Ways</u> | <u>Expense (\$)<sup>1</sup></u> | <u>Additional Annual<br/>Labor (hrs)</u> |
|------------------------------------|--------------|----------------------------------|---------------------------------|--|
| Proposed Action<br>(No Wilderness) | 0            | 0                                | 0                               | 0  |
| All Wilderness                     | 59.40        | 19.5                             | 530                             | 640                                      |
| Bitter Creek East                  | 44.00        | 12.5                             | 450                             | 460                                      |
| Enhanced                           | 25.25        | 10.5                             | 360                             | 260                                      |

<sup>1</sup>Excludes additional labor.

It is assumed that maintenance on range improvements would continue as needed. Most maintenance can be accomplished in a nonimpairing manner and is justifiable for resource protection and grazing management. However, wilderness designation could create possible conflicts with the location of new water development and maintenance on existing improvements. Stress associated with poor water distribution and trailing long distances between forage and water contributes to poor conception rates. Maximum livestock conception can only be obtained when both forage and water are adequate.

## APPENDIX 4.2: WILDERNESS IMPACT ON LOAN AND SALE VALUES

The impact of wilderness designation on loan and sale values is an issue. Agricultural Management and Economic Consulting (1982) contacted a variety of people concerning this issue and found that lenders would place a lower lending value on an operation containing wilderness.

Lenders would also restrict the length of the loan to an operator with designated wilderness. The potential loss in loan value could vary from a 20% reduction to the worst case situation where none of the BLM grazing in wilderness would be valued for loan purposes. The potential loss in loan value is shown in Table 2 by alternative.

The assumptions used to define these values are:

1. a partial reduction in loan value (20%); or
2. none of the BLM grazing in wilderness would be valued for loan purposes; and
3. the value of an AU (animal unit) on BLM administered land is .6 that of a deeded AU for lending purposes. With a deeded AU valued at \$1,800, a BLM leased AU has a loan value of \$1,080 ( $\$1,800 \times .6 = \$1,080$ ).

The total loss in value by alternative was calculated as follows: the total AUMs for each alternative are divided by 12 which gives the number of AUs; the number of AUs are multiplied by \$1,080 and this equals the loan value of BLM grazing by alternative (AUMs divided by 12 = AUs) and  $AUs \times \$1,080 = \text{loan value}$ ).

This loss of loan value is considered short term. After several years without a change in livestock use levels, lenders would probably be more willing to value BLM grazing permits in wilderness areas for lending purposes. The potential loss of loan value is shown by alternative not operator, since BLM has no data on the lendability of individual operators. The impact of these dollar values on operators would vary with their dependency on WSA grazing.

Almost no information on the impact of wilderness designation on sale value was available. Agricultural Management and Economic Consulting (AMEC) (1982) found that it is probable that wilderness designation would give potential buyers concern. Land values may be lower for ranch operations with potential wilderness when compared to similar units without. The cumulative impacts of increased costs and reduced loan value are difficult to assess because they depend upon the specific financial situation of the individual operators.



**Table 2**  
**Range in Potential Loss in Ranch**  
**Loan Value by Alternative**

| <u>Alternative</u>                 | <u>Range of Potential Loss</u><br><u>in Loan Value (\$1,000)<sup>1</sup></u> |
|------------------------------------|--|
| Proposed Action<br>(No Wilderness) | 0  |
| All Wilderness                     | 132-659  |
| East                               | 84-421   |
| Enhanced                           | 54-269   |

<sup>1</sup>Assumes a partial reduction in loan value of 20% and a total reduction in loan value.

# GLOSSARY

- ACCELERATED EROSION.** Erosion increased by human activities; also see "Natural Geologic Erosion."
- ALLOTMENT MANAGEMENT PLAN (AMP).** A written program of livestock grazing management, including supportive measures, if required, designed to attain specific management goals in a grazing allotment.
- ANIMAL UNIT MONTH (AUM).** A standardized unit of measurement of the amount of forage necessary for the complete subsistence of one animal unit (one cow or one horse or five sheep, all over six months old) for one month.
- BAILY-KUCHLER SYSTEM.** A classification system that divides the United States into ecosystems based on climate, vegetation, soils and landform.
- CHERRY-STEMMED ROAD.** A road that enters but doesn't pass completely through a wilderness study area.
- CHISELING.** Breaking or loosening the soil, without inversion, with a chisel cultivator or chisel plow. A practice used in grasslands having rhizomatous species.
- CULTURAL SITE.** Any location that includes prehistoric and/or historic evidence of human use.
- ECOSYSTEM.** An ecological community together with its physical environment. Its functioning involves the circulation of matter and energy between organisms and their environment.
- ENVIRONMENTAL IMPACT STATEMENT (EIS).** A written analysis of the impacts on the environment of a proposed project or action.
- FEDERAL LAND POLICY AND MANAGEMENT ACT (FLPMA).** Public Law 94-579, October 21, 1976, referred to by the Bureau of Land Management as its "Organic Act," which provides most of BLM's legislated authority, direction, policy and basic guidance.
- GRANDFATHERED ACTIVITY.** Any land-surface disturbance or alteration that occurred in a wilderness study area before passage of FLPMA (see above).
- HABITAT.** A specific set of physical conditions that surround a species, group of species or a large community. In wildlife management, the major constituents of habitat are considered to be food, water, cover and living space.
- IMPAIR.** Causing serious adverse impacts on wilderness values.
- INHOLDINGS.** State or privately-owned lands inside a wilderness study area.
- INTERIM MANAGEMENT POLICY (IMP).** A BLM document which defines the policy for management of wilderness study areas until a final determination on wilderness designation is made by Congress.
- KNOWN GEOLOGIC STRUCTURE (KGS).** Areas known to contain producible oil and gas deposits.
- LAND UTILIZATION (LU) LANDS.** Land reacquired and managed by BLM through the Bankhead Jones Act of 1937.
- LEASABLE MINERALS.** Minerals subject to lease by the Federal Government, including oil, gas and coal.
- LIVESTOCK SALES.** Receipts from the sale of livestock and livestock products. Livestock sales were estimated at \$18.96/AUM (estimated from the N.D. Grazing EIS Ranch Budget analysis).
- LOCATABLE MINERALS.** Generally the metallic minerals subject to development specified in the Federal Mining Law of 1872.
- MANAGEMENT FRAMEWORK PLAN (MFP).** A planning decision document that establishes, for a given planning area, land use allocations, coordination guidelines for multiple use, and management objectives to be achieved for each class of land use protection. It is the BLM's land use plan. An MFP is prepared in three steps: (1) resource recommendations, (2) impact analysis and alternative development, and (3) decision making.
- MULTIPLE USE.** Balanced management of the various surface and subsurface resources, without permanent impairment of the productivity of the land that will best meet present and future needs.
- NATURAL.** Refers to an area which generally appears to have been affected primarily by the forces of nature with the imprint of man's work substantially unnoticeable.
- NATURAL GEOLOGIC EROSION.** The wearing away of the land's surface by running water, wind, ice or other geological agents, unaffected by human activities.
- OFF-ROAD VEHICLE (ORV).** Any motorized track or wheeled vehicle designed for cross-country travel over any type of natural terrain.
- OUTSTANDING.** Standing out among others of its kind; conspicuous; prominent; or, superior to others of its kind; distinguished; excellent.
- PERMIT (GRAZING).** An authorization that permits the grazing of a specified number and head of livestock on a designated area of BLM lands for a period of time, usually not more than one year.
- PERMIT VALUE.** The market value of a BLM grazing permit which is often included in the overall market value of the ranch.
- PRE-FLPMA LEASES.** Mineral leases issued prior to passage of the Federal Land Policy and Management Act of October 21, 1976.
- POPULATION CENTER.** An SMSA (see below) with a population of 100,000 or more.
- POST-FLPMA LEASES.** Mineral leases issued after passage of the Federal Land Policy and Management Act of October 21, 1976.

**PRIMITIVE RECREATION.** Nonmotorized outdoor recreation that requires undeveloped areas in which to take place.

**PUBLIC LANDS.** Any land and interest in land (outside of Alaska) owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management.

**RECREATIONAL OPPORTUNITY.** Those outdoor recreation activities which offer satisfaction in a particular physical, social and management setting. In the EIS areas, these activities are primarily hunting, fishing, wildlife viewing, photography, boating and camping.

**SIMULTANEOUS LEASING. (OG SIM).** Oil and gas estates on public lands leased through lottery-type drawings.

**SOLITUDE.** The state of being alone or remote from habitations; isolation or a lonely, unfrequented or secluded place.

**STANDARD METROPOLITAN STATISTICAL AREA (SMSA).** A county containing at least one city with 50,000 inhabitants plus any adjacent urban territory.

**TACK-ON.** Public lands with wilderness characteristics but less than 5,000 acres in size adjacent to other public lands designated as wilderness or being studied for such designation.

**VEHICULAR WAY.** A trail maintained solely by the passage of vehicles.

**VISUAL RESOURCES.** The land, water, vegetation and animals that comprise the scenery of an area.

**WILDERNESS AREA.** An area formally designated by an act of Congress as part of the National Wilderness Preservation System.

**WILDERNESS MANAGEMENT.** The management of human use and influence on lands which have been designated by an Act of Congress as wilderness areas.

**WILDERNESS STUDY AREA (WSA).** An area determined to have wilderness characteristics. Study areas will be subject to interdisciplinary analysis and public comment to determine wilderness suitability. Suitable areas will be recommended to the President and Congress for wilderness designation.

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